

COMMENT MATRIX
CITATIONS FROM COMMENTS RECEIVED BY THE
DELTA STEWARDSHIP COUNCIL BETWEEN
DECEMBER 4, 2010 AND JANUARY 7, 2011

The following matrices include direct citations from comments received by the Delta Stewardship Council (Council) between December 4, 2010 and January 7, 2011. The citations are directly from letters and emails, and were not corrected for misspellings or grammar. Many comments were excerpted due to the length of the comment. All of the letters and emails are located on the Council website. The comments were placed into eight categories, as summarized below. Several comments occur in several categories. These comments do not include comments submitted to specific work groups.

Number	Title	Number of Comments	Page
Matrix 1	List of Commentors	11	2
Matrix 2	Comments Related to Water Resources	92	3
Matrix 3	Comments Related to Water Quality	5	16
Matrix 4	Comments Related to Ecosystem Resources	79	18
Matrix 5	Comments Related to Delta as an Evolving Place	33	30
Matrix 6	Comments Related to Agricultural Resources	77	34
Matrix 7	Comments Related to Risk Reduction	86	51
Matrix 8	Comments Related to Development of the Delta Plan	1	73

Matrix 1 List of Commentors (12/4/10-1/7/11)

Association	Signatory	Date
California Department of Water Resources	Rich	12/15/2010
California Department of Water Resources	Rich	12/20/2010
Coalition for a Sustainable Delta	Phillimore	1/7/2011
Coalition for a Sustainable Delta	Phillimore	1/7/2011
Contra Costa Water District	Gartrell	12/5/2010
Member of Delta Independent Science Board	Mount	1/7/2011
Resident of Delta	Zuckerman	12/27/2010
Sacramento-San Joaquin Delta Conservancy	Nejedly Piepho	12/13/2010
State and Federal Contractors Water Agency	Buck	12/29/2010
The Nature Conservancy	Winternitz	12/23/2010
Yuba County Water Agency	Aikens	12/13/2010

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Much of the property in the Delta lacks surface water rights; this is an issue that has been raised before the State Water Resources Control Board on numerous occasions and is well documented in various reports, but action has been very slow to address the substantial number of illegal and unpermitted diversions that occur in the Delta. In addition, there is increasing use of groundwater as a substitute for surface water (likely because of quality concerns) to irrigate Delta agriculture in certain areas. Many of these groundwater basins are overdrafted, making this practice unsustainable. Consideration should be given to the source of water for irrigating Delta agriculture in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Page 1 of Executive Summary (p. ES-1): The summary of factors impacting the State's water supplies and deliveries should also include environmental restrictions, which limit the deliveries of water to various users throughout the State, including the restrictions imposed on pumping from the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Page 1 of Executive Summary (p. ES-1): The discussion of water infrastructure should mention the impact of the 1968 Wild and Scenic Rivers Act on development of additional water storage facilities on certain river systems.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Page 2 of Executive Summary (p. ES-2): There is a statement that the State Water Project ("SWP") and Central Valley Project ("CVP") systems were "fully constructed" over the last twenty years; that is incorrect as a peripheral canal and other facilities were always part of the original plan for development of the SWP and these facilities have not yet been completed.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Page 2 of Executive Summary (p. ES-2): The recent reductions in water deliveries from the Delta for species protection, in addition to increasing overdraft of groundwater basins, has increased the costs of supplemental water purchases historically used to supplement Delta water supplies.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Page 2 of Executive Summary (p. ES-2): In response to reduced Delta water supplies, users in the Central Valley have taken steps to reduce consumptive use of water, and have also undertaken efforts to acquire supplemental water supplies from other sources where further reductions in water usage are not feasible.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-1): Over the last two decades, there has been a reduction in the available water supply for urban and agricultural users, particularly from the Delta; the same is not true with respect to the amount of water available for the environment, which has increased as a percentage of the available supply over that same time period.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-2): The discussion regarding water use, particularly related to precipitation and runoff, should more clearly indicate when the discussion relates to surface water and when it relates to groundwater; there are differences that are critical to understanding the issues surrounding supplies and uses.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-3): The statement “The variability of precipitation results in a mismatch between water availability and water needs” is unclear; this would be more clear if it was revised to state: “the annual variability of precipitation and the annual timing (i.e., the majority of the precipitation occurs from Nov-Apr and the majority of demands occur from May-Sept) result in a mismatch between water availability and water needs.”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-4): Water supply projects have been developed in the State to capture, store, and convey water not only to deal with variability between wet and dry years but also to deal with timing differences between precipitation patterns and water supply demands, as discussed in the comment above.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-13): The amount of water used for agriculture over the last four decades should be clarified; does the 38-42 million acre-feet figure refer to total use (surface water and groundwater)? And, does this figure refer to consumptive or applied use?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-14): The CVP contractors not only lost water but also paid for certain portions of the implementation of the Central Valley Improvement Act (“CVPIA”); this should be clarified.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-14): The current biological opinions for delta smelt and salmonid species have been challenged in federal court; most recently, Judge Wanger issued a decision invalidating the biological opinion for delta smelt and has indicated in a ruling on water users’ preliminary injunction motion related to the salmon biological opinion that the federal fisheries agency failed to comply with the law in issuing that biological opinion. The status of the biological opinions should be clarified within the Water White Paper...	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-15): The discussion and summary of the flow objectives recently issued by the State Water Resources Control Board and Department of Fish and Game fails to acknowledge the many caveats in both reports, including the admittedly narrow focus of the inquiry into flows to support public trust resources in the Delta. In addition, both reports acknowledge that less flow would be necessary if other stressors on the ecosystem where addressed; this should be clarified within the Water White Paper and the resulting Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California” (p. 2-17): The use of the term “climate changeto refer to variability in precipitation is confusing.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-17): In the discussion of total water use, it should be noted that water users (both agricultural and urban) fund a large portion of the water supplies allocated to environment, resulting in significant water supply reductions and a resulting increase in the price paid for the water actually received.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-1): The discussion of water supply development in the Delta should be clarified to refer to the Sacramento and San Joaquin river systems, so it does not sound as though the statements are referring only to those two rivers, but also to all of the tributaries that flow into the Sacramento and San Joaquin Rivers.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-2): Runoff to the Delta supplies over 600 million acres of irrigated agriculture (this figure is used in the Executive Summary) – not the 700 million acres referred to on this section; this should be corrected.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-2): The discussion of Delta water quality should include the recent research regarding the impacts of ammonia discharges from wastewater treatment plants, particularly the Sacramento plant, on the aquatic ecosystem. In addition, discussion of water quality impacts associated with urban stormwater and agricultural drainage discharges also should be included in this discussion. The focus on salinity is misplaced; while salinity may have been an historic focus, there are other water quality concerns within the Delta that should also be considered in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-5): The discussion of agricultural discharges should include discussion of the lack of a long-term drainage solution for the area west of the San Joaquin River and the ongoing litigation involving this issue.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (pp. 3-6 – 3-7): The diversions upstream of the Delta from the Mokelumne and Tuolumne River watersheds should be discussed in greater detail; these Rivers eventually flow into the Delta and thus upstream diversions impact the quantity and quality of water in the Delta. Additional information about these diversions, including quantity and timing, should be included in the Delta Plan, to provide a more complete picture of the State's water resources and demands, particularly with respect to the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Contra Costa Water District	12/5/2010	WRESWP The description of historical Delta water quality presented in the water resources white paper contrasts the description presented in the ecosystem white paper. As the Council moves forward with the Delta Plan, it is imperative that the final document be internally consistent.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Contra Costa Water District	12/5/2010	WRESWP p. ES-1 line 9 should read "Since the beginning of European settlement of California in the late 1700s ... "	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Contra Costa Water District	12/5/2010	WRESWP p. 2-2 line 1 should read "Water use is impacted by water availability and varies based on temperature, precipitation, available runoff and demand. "	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Resident of Delta	12/27/2010	AGRESWP Farming in the Delta actually conserves water. Evapotranspiration from water surfaces in the Delta exceeds 5 feet annually, whereas crop irrigation, especially through sub-irrigation which does not flood the surface, consumes 3 feet or less, depending upon the crop. Thus, if the agricultural lands were flooded, more fresh water would be consumed. In addition, phreatophytes (tules, hyacinths and other water loving plants typical of flooded lands) generally consume about 8 feet of water.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Resident of Delta	12/27/2010	AGRESWP In Section 6, page 6-4, the paragraph entitled "Water Supply" is generally inapplicable to the Delta. The ground water generally available underlying Delta soils is of unsuitable quality for use either as irrigation water or human consumption.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	AGRESWP Also, in Section 6 ,at page 6-3, in the paragraph entitled "Water Quality" agricultural run-offis identified as "one of the main sources of water and soil contamination in the Delta." While this may be true, the source of the contamination is typically upstream of the Delta from ocean salts exported to the San joaquin Valley by the Central Valley Project, native soil constituents leached from the irrigated lands of the San joaquin Valley (including selenium and boron), and chemicals added in agricultural and urban uses, and drained into the Delta through the San joaquin River. Because ofthe high nitrogen content of the native Delta soils and the lack of conditions suitable for tree and vine crops, many of the fertilizers, herbicides and pesticides found in the waters of the Delta are contributed elsewhere. The same criticism applies to the text found in Section 5, from page 5-2 line 26 to page 5-3 line 5.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP (Page) ES-1, Line (L) 7-8: The comment that in drier years "demand for exports from the Delta increases" is not really accurate. The ability of exports to be delivered via the Delta is reduced, which adds stress on increased demands in the export service areas. Because project deliveries are governed by contracts and not "demands" in the service areas, the statement as it is doesn't reflect the actual reality vis-à-vis "demand for exports" and as such should be modified.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-1, L 9: insert "in" between "California" and "the"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-1, L 9-10: an "agricultural area" can't construct a dam, while "communities" can. Also, not all dams were used to "convey water from major rivers". That really didn't come until later. Most dams were on smaller tributaries or creeks etc.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 1-2: The sentence at the top of the page should be modified to include that this situation is the case with current infrastructure and under the current configuration/ geometry of the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 7: It is not so much that "water availability" has been reduced, which while true at times is not true all the time. The real issue is that "water supply reliability" has been reduced, particularly because of the uncertainties related to regulatory triggers etc.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 13-14: The SWP and CVP have not been "fully constructed". Suggest striking "...the CVP and SWP systems were fully constructed and..." Also, insert "at times" between "reduced" and "to".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 20-21: Not sure it's accurate to say "reduce the consumptive use of water" is really correct, perhaps substitute "increase conservation and water use efficiency". "...reduce overall water diversions" is also not really accurate because it doesn't account for the temporal nature of water management and presumes a result that isn't necessarily true.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 22-23: The conclusory statement that "...the available water supply and water quality is not sufficient for all the beneficial uses" should be deleted. Although, it's really pretty meaningless as written since there will always be unmet demands, and in reality California's water supplies are meeting most needs, there is potential for some to misinterpret such a statement as implying that some demands have to be eliminated, which is not the case. There is plenty of water in California, we just have to build infrastructure (physical and administrative) to better manage it.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 24-25: Sea-level rise will impact exports if nothing is done to adapt to it. Part of the purpose of proposed new conveyance in the Delta is in fact to address this issue. It is true that impacts to in-Delta diverters will be affected by sea-level rise. These differences should be spelled out rather than making a generic statement.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 25 & 27: change both uses of "could" to "will"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP ES-2, L 29-30: Again, the impact will occur if nothing is done to address it and adapt, plans for which are under development now. This is written as if nothing is happening.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 1-1, L 16: the term "Delta-related projects" needs to be defined. Alternatively, it seems from the exchange at the Council meeting on 12/17 that the intent is really to mean "covered activities". Consequently, that defined term should be used instead.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 1-1, L 27-28: Delete "Despite the Delta's importance"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 1-3, L 9: desalination is called out as a strategy, why not also cite recycling, conjunctive use programs, groundwater banking programs, brackish desalination (i.e. not just ocean which is implied), and water use efficiency programs. All are part of California's current and future water management portfolio.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-1, L 11-13: While this caveat/clarification is important, it begs the question of the implication of this “dated” aspect of the data for the discussion that follows. It seems that based on the end of the sentence that the reader might assume things are “worse” than described? Is that the intent? It seems like some additional context would be useful.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-3, L 3: “variability” is the wrong word here, unless “geographic” were inserted before it	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-3, L8-10: This sentence is fairly meaningless because we don’t do that in the sense that is acknowledged on the next page at lines 16-17. Because the point is made on page 2-4, we suggest deleting this sentence.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-4, L 12: Use of “5 to 15 percent” might imply a small amount of impact when the reality is that represents a significant amount of water by volume.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-6, L 12: Instead of “rely on Delta water”, we suggest “rely on water from the Delta watershed”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-9, L 17: strike first “water” and make “appliance” “appliances”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-13, L 1: the text says “agricultural water usage” while the chart is “applied water”. Applied water is not the same as water “use” because it’s not all consumed. Also, the numbers in the text (38-42 MAF) don’t jibe with the chart which shows a high of about 36MAF and the range going down to about 31MAF.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-14, L 42: insert “SWP and CVP” between “of” and “water supplies”, and delete “from the Delta”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-15, L 1-2: When referencing the SWRCB flow criteria they should be described specifically as they were directed in the Delta Reform Act (Act), i.e. “flow criteria...to protect public trust resources”. Without that specificity some might interpret the SWRCB flow criteria cited as actual flow criteria for regulatory purposes, which is expressly not the case in the Act.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-15, L 5: See comment above. Also, when referencing SWRCB conclusions, the total context of the SWRCB report must be provided, i.e. that the recommendations are based upon the current physical system and without addressing other stressors. Changes to the system and addressing other stressors are identified as potentially resulting in less flow being necessary than assumed without doing so.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-15, L 19: replace “for flow” with “of”. Not all beneficial uses require “flow” per se.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 2-17, L 3: add “watershed” after “Delta”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-1, L 6: substitute “support” for “allow”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-1, L 19: add “from the Delta watershed” after “water”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-1, L 26: Is the 21MAF average “runoff into the Delta” the actual measure of “runoff” or is that really an average of Delta “outflow” as represented on the chart on the next page? If the latter, then “runoff into the Delta” would not be accurate. In addition, because of the variability of runoff/outflow from year-to-year, it is important to note that variation (both wet and dry) and how that plays into water management overall.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-1, L 29: insert “watershed” after “Delta”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-2, L 2: strike “water-rich” or, alternatively, add “watershed” after “Delta”. The Delta is not a source of water; it is a transit point for water flowing out of the watershed.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-2, L 5: insert “watershed” between “Delta” and “water”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-2, L 8: should add "Bay Area" as well	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-2, L 11: Assume 700 should be 7?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-3, L 36: the discussion of increases in delta salinity should also address channel dredging, which likely significantly increased seawater intrusion.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP Page 3-5, Line 21. Should be Hetch Hetchy Aqueduct, not Tuolumne Aqueduct.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-8, L 3: "Marshall Plan" is referenced but not described. What is it? Suggest deleting reference.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-8, L 20: should identify "settlement" contracts with the Sacramento Valley users and "exchange" contracts with users on the San Joaquin. In addition, it should be explained what these contracts mean in relation to the CVP, i.e. they were to replace "lost" riparian rights that have high priority under California water rights law.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-8, L 24: Bay Area and Santa Clara Valley are redundant, suggest striking the former.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-8, L 26, substitute "management" for "cooperation"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-8, L 30: substitute "milestones" for "milestone"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-11, L 16-20: The Los Angeles Aqueduct goes to the Owens Valley, not to Owens Lake. The aqueduct was extended to the Mono Basin, not to Mono Lake. Water rights are from Mono Basin, not Mono Lake.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-11, L 20-21: substitute “expanded” for “created”. The public trust doctrine goes back to the British monarchy; it wasn’t “created” by Audubon. Audubon applied it in an expanded fashion in California, moving it into environmental concerns when it had traditionally been focused on navigation. The SWRCB undertook the hearing, not the RWQCB, and modified the subject water rights.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-11, L 24-43: This is an inadequate discussion on Colorado River use and rights, which is not appropriate considering the title of the subsection is “Southern California Aqueducts”. The focus should be on the development of the aqueducts (All American, Coachella, MWD’s CRA) and then the water issues. For example, it would be more important to characterize the formation of the MWD to build the CRA than it is to haphazardly highlight San Diego, twice, in terms of their water rights. If the point is to show that individual agency rights were consolidated into MWD’s rights, then it should be mentioned that the City of Los Angeles also had rights to the Colorado River. The Supreme Court decision on AZ vs. CA is mischaracterized, leaving the reader to think that supplies were immediately cut in half. The QSA discussion should show a comprehensive review of programs and transfers vs. a singular focus on SDCWA/IID. The reference to and Figure 3-7 itself is out of place in this section.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-12, L 3: A statement about California’s actual groundwater use would be more appropriate than implying that there is a national reserve of groundwater that California taps disproportionately.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-13, L 12: This definition doesn’t account for “managed overdraft” which is practiced throughout California and should be acknowledged.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP Page 3-16, Line 37. Should add that water demand has “on average” exceeded supply in the Tulare Basin. Supply still is in excess in wetter years.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-19, L 15-16: This sentence is out of date. In fact, the situation at MWD has reversed, with “surplus” available in only 3 of 10 years, not 7 of 10.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-19, L 17: insert “only” between “been” and “two”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-19, L 20: substitute "low elevations" for "low"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-19, L 25: insert "thus" between "has" and "called" and insert "for" between "called" and "more"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-21, L 8-12: Description of City of Fresno "evaporation" ponds is incorrect. City reports describe them as incidental percolation ponds, and report that about 90 % of wastewater is either percolated or supplied directly to agricultural uses.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 3-21, L 14: Should be "golf course" not "gold course"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 4-1, L 1: insert "the reliability of" between "to" and "future"; strike "Delta"; add "from the Delta watershed" after "supplies"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
State and Federal Contractors Water Agency	12/29/2010	WRESWP 4-5, L 26: This section makes no reference to DWR's major report on Climate Change from a few years ago, nor is it listed in the references. This should be rectified.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
The Nature Conservancy	12/23/2010	WRESWP ...the discussion in the Water to Meet Environmental Requirements section (p.2-14) is lacking. The paper would benefit from an enhanced discussion on water needs to meet environmental uses in rivers and streams throughout the state.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
The Nature Conservancy	12/23/2010	WRESWP The important issue of over-allocation or over appropriation of water supplies to meet all beneficial uses (including public trust – fish and wildlife) is not specifically discussed in this document...We will not resolve California's water shortage problems in a sustainable manner until we directly address this issue.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
The Nature Conservancy	12/23/2010	WRESWP I suggest that:...The authors offer a formal definition for the term "over-allocation of water supplies".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
The Nature Conservancy	12/23/2010	WRESWP I suggest that...That the authors discuss the State Water Resources Control Board's process for determining that "no water is available for appropriation" in certain rivers and streams. The discussion should include an explanation of what this means, tie it back to the overallocation issue, and include a discussion of ramifications for water users and public trust uses.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
The Nature Conservancy	12/23/2010	WRESWP I suggest that...That a case study scenario be developed to provide a real life example of these issues. If requested, I can work with the authors to provide examples.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
The Nature Conservancy	12/23/2010	WRESWP The State Board recently developed a list identifying 127 high priority rivers and streams that are in need of instream flow protection to provide for the state's aquatic resources. In our comment letter to the State Board, The Nature Conservancy identified an additional 62 rivers and streams that provide for important salmonid habitat and meet the State Board's and the Department of Fish and Game's criteria for priorities. These rivers and streams are also included in the salmon recovery plans of the National Marine Fisheries Service. Providing the water to meet public trust needs have to be considered in overall water planning for the state. In an over-allocated system, this becomes particularly challenging. This discussion should be included in the Water Resources White Paper.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources
The Nature Conservancy	12/23/2010	WRESWP The importance of water markets and water transfers in this state as a means for providing critical water supplies is unquestioned. Yet, given the nature of over-allocated resources, it appears that a closer review of water transfers, particularly permanent water transfers is needed to provide a balance among water users, including public trust resources. The Dudley Ridge Water District permanent transfer to the Tejon Ranch Company is a case in point. As an important aside, the selling price in the Dudley Ridge transfer (about \$5,500 per acre-foot), is 10 times the original cost of the water. Besides Dudley Ridge, within the last 10 years, Tulare Lake Basin has had four permanent water transfers. The transfers amount to more than 18,000 acre-feet. A case study of this issue would make a good addition to the Water Resources white paper and further drive home the point of the need for sustainable water management in the state for all beneficial uses.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 2 Comments Related to Water Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Yuba County Water Agency	12/13/2010	WRESWP As described in more detail below, that white paper does not reflect the best available information concerning Yuba River streamflow standards. Specifically, on page 2-16, that paper lists the Yuba River as one of the "Streams That Require Objectives Now." That listing fails to acknowledge that, in 2008's Corrected Order WR 2008-14, the State Water Resources Control Board (SWRCB) adopted new streamflow requirements for the Yuba River...In light of these facts, the SWRCB did not list the Yuba River as requiring further streamflow studies in the draft "high priority streams" report it recently issued under the 2009 Delta Reform Act.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Yuba County Water Agency	12/13/2010	WRESWP the Council should remove the Yuba River from any list of streams that require further streamflow objectives that the Council produces or considers.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources
Yuba County Water Agency	12/13/2010	WRESWP Notwithstanding the white paper's lack of citations to DFG documents as supporting its Table 2-1, the apparent support for that table's listing of "Streams That Require Objectives Now" is DFG's May 22, 2008 rep01i "Flow Recommendations to the State Water Resources Control Board." ...That report addresses the same list of streams as Table 2-1 's list of "Streams That Require Objectives Now." That report, however, does not account for the Yuba River Accord and, for the lower Yuba River, discusses only the streamflow recommendations contained in DFG's 1991 Lower Yuba River Fisheries Management Plan. The Yuba River Accord, and its Fisheries Agreement that DFG signed, supersedes DFG's 1991 plan. Accordingly, DFG's 2008 report does not reflect the current status of fisheries management in the lower Yuba River. The Council therefore should not rely on that report in considering fisheries issues relating to the Yuba River and, ideally, should delete the Yuba River from the Water Resources white paper's Table 2-1. Failing that, the Council should not include any provisions in the Delta Plan concerning the Yuba River based upon that Table 2-1.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources

NOTE: WRESWP - Water Resources White Paper, AGRESWP - Agricultural Resources White Paper

Matrix 3 **Comments Related to Water Quality (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Many farming operations in the Delta return untreated runoff irrigation water containing both pesticides and excess fertilizer back into the Delta without any treatment.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-2): The discussion of Delta water quality should include the recent research regarding the impacts of ammonia discharges from wastewater treatment plants, particularly the Sacramento plant, on the aquatic ecosystem. In addition, discussion of water quality impacts associated with urban stormwater and agricultural drainage discharges also should be included in this discussion. The focus on salinity is misplaced; while salinity may have been an historic focus, there are other water quality concerns within the Delta that should also be considered in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Contra Costa Water District	12/5/2010	WRESWP The ecosystem white paper offered a contradicting and inaccurate assessment of salinity in the Delta stating on page 4-20 "The Delta of today is managed to keep salinity uniformly low year-round . . ." Delta salinity is less variable than it was historically, but it is because the Delta freshens to a lesser extent in the winter and spring of dry years, and it remains saltier in the fall of all years, producing not a uniform salinity, but higher salinity with a variability that is reduced in range but similar regardless of hydrological conditions (wet and dry years all have similar salinity variation with fresh conditions greatly reduced).	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

Matrix 3 Comments Related to Water Quality (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Contra Costa Water District	12/5/2010	WRESWP p. 3-3 After line 35 should include a description of land use changes that also contributed to increased salinity intrusion. The following paragraph is suggested: Sea water intrusion increased during the dry period (1920-1934) due to the decrease in river flow but changes in hydrology were compounded by changes to the landscape. Reclamation of Delta marshland began around 1850. By 1920, almost all land within the legal Delta had been diked and drained for agriculture. Before the levees were armored and the marshes were drained, the channels would have been shallower and longer (more sinuous), which would have slowed propagation of the tides into the Delta, reduced tidal energy and reduced salinity intrusion. Progressive deepening and straightening of shipping channels began in the early 1900's. Deepening the and straightening river channels increases the propagation speed of tidal waves, and decreases energy losses, leading to increased salinity intrusion. Original channel depths were less than 10 feet; channels were gradually dredged to depths exceeding 30 feet, and maintenance dredging continues today.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
Contra Costa Water District	12/5/2010	WRESWP p. 3-7 Figure 3-7 The legend should be expanded to explain what the different colored areas and lines on the map represent.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources

NOTE: WRESWP - Water Resources White Paper, AGRESWP - Agricultural Resources White Paper

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Much of the water used to irrigate Delta agriculture is piped onto the Delta islands through unscreened diversions. Again, this issue has been documented in the past by the Department of Fish and Game and other State entities, but no action has been taken to address the impacts on fish species in the Delta as a result of the unscreened diversion facilities. It is hard to believe that water diversions from the Delta that are unscreened can be part of a sustainable agricultural industry and a restored Delta ecosystem.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Biological Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 2 – Water Use in California (p. 2-15): The discussion and summary of the flow objectives recently issued by the State Water Resources Control Board and Department of Fish and Game fails to acknowledge the many caveats in both reports, including the admittedly narrow focus of the inquiry into flows to support public trust resources in the Delta. In addition, both reports acknowledge that less flow would be necessary if other stressors on the ecosystem were addressed; this should be clarified within the Water White Paper and the resulting Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP General comment: The document does a good job at describing Delta ecosystem habitat types, and the history of man made changes in the system. However its summary of stressors is too high-level to be truly informative. It makes a number of unsubstantiated statements about the causes and effects of ecosystem change, and it perpetuates past understandings related to species like Delta smelt and salmonids that are no longer supported by the science or under significant challenge and debate, without even referencing these growing uncertainties.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP Also, various aspects of the discussions in Sections 4 and 7 generally reach various conclusions that are factually incorrect. See comments regarding Tables ES-1 and ES-2 below particularly. Please also see SFCWA technical comments on draft the DFG flow policy document, which we are including with this submittal, along with the RWQCB staff summary describing the basis of its recommended permit for the SRCSD wastewater facility and their response to queries from Senator Steinberg.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP Page (P) ES-1, Line (L) 4-5: "The Delta ecosystem is now in peril." This statement is only true if one is talking about an ecosystem that used to be dominant, whereas the current "ecosystem" is thriving in many ways, but its biomass is 95-98% nonnative and the functions and processes that once served to promote and support native species, particularly those of concern and subject to application of the Endangered Species Act (ESA), have been deteriorating for a multitude of reasons. This sort of simple statement should be avoided and appropriate context and description of complexity included. The consultants are also seemingly comparing the productivity of the Delta to other non-estuarine ecosystems and making a judgment as to which is more productive and diverse, which is subjective therefore not very accurate comparison.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-1, L 19-20: For the POD species, particularly Delta smelt, nobody knows the size of the population. Trends are measured over time using abundance indices. Therefore, it would be more accurate to state that species abundance is declining rather than stating that the population is declining.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-1, L 22: The sentence is unclear that states, "...river and slough corridors for migratory fish laden with hazards to their survival...." What are the hazards? If they mean predators, the consultant should say predators.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-1, L 28-30: The following sentence should be revised, "...very low variability in salinity and other water quality parameters, contaminant uptake...." The scientific basis for the statement that variability in salinity is a stressor is under dispute. There are no published papers that have concluded that any fish species would benefit from varying the location of X2. Historically, salinity may have been more variable, drawing X2 much further upstream (away from the Golden Gate) than it is ever allowed to vary currently (per the State Water Resources Control Board's Water Quality Control Plan). The statement begs the questions of whether the consultant believes that that variability should be returned to the Delta environment and what are the other water quality parameters that the consultant thinks should be varied? These are questions better left to the SWRCB water quality control plan process.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP [Note: All comments regarding Tables ES-1 and ES-2 are also applicable to Tables 4-1 and 4-2 respectively.]	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1 (repeated later in the document at p. 4-2): If Delta exports have an impact on contaminant and nutrient loading, wouldn't in-Delta diversions too?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: Should add "fishing", "urban storm runoff" "atmospheric deposition", and "land use changes" to "human modifications". (Also modify in sec. 4)	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: Should delete check mark that identifies Delta exports linked to contaminants and nutrients. Should also separate contaminants from nutrients. (Also modify in sec. 4)	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: The assumption that salinity variability is a stressor is without scientific support (published papers) and yet it is included on the table as a category of stressor that is of the same certainty and importance as changes in physical habitat and invasive species. This is scientifically unjustified.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: What does time variability mean and how is that different than salinity variability? If time variability means timing of outflow, then time variability and salinity variability is the same thing. The hypothesis regarding a purported change in flow variability, at least on the Sacramento River, is based on unpublished work by The Bay Institute and NRDC. Their analysis is flawed, as SFCWA has explained in detail in our comments on the draft DFG flow policy document.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: There should not be a category of stressor called "flow related habitat loss." This is apparently a reference to X2. There is substantial scientific disagreement as to whether habitat can properly be defined according to flow variables. Again, see SFCWA comments on DFG flow policy document.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: The consultant should be aware that the state and federal water projects have limited influence over the location of X2. In fact, the state and federal water projects ability to influence the location of X2 was recently characterized by agency experts at the State Water Board flow proceedings as similar to a row boat (water projects) trying to move a large barge (X2).	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: We question the scientific basis of dams causing invasive species.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: How have upstream and/or in-Delta water diversions caused habitat loss and invasive species? Are there analyses suggesting that upstream and/or in-Delta water diversions are so large that they influence the location of X2? If so, please post to website.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: We are unaware of any biological mechanism that would explain how the state and federal water projects could have caused habitat loss and loss of habitat connectivity in the Delta, and invasive species. We are also unaware of any published study that has reached any of these conclusions. If one exists, please post to web site.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: The state and federal project's export of water does not cause contamination and nutrient loading. The table should be amended accordingly.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-2, Table ES-1: The large dams certainly had an effect on the magnitude of sediment washing into the delta, but the ongoing operations have little effect on sediment loading.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, Table ES-2: The agencies do not have population estimates for the POD species, rather the agencies measure trends in abundance using indices. The table should be amended accordingly.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, Table ES-2: The consultant cannot conclude that all of the checked items led to declines in population numbers- meaning all of these factors had a population level effect on the species. There has been no analysis that reached conclusions regarding the population effect of each of the identified stressors. The appropriate tools for such an analysis have just become available (like life cycle models). Therefore, the current table should be amended to indicate various factors are affecting the species to varying degrees without making a representation regarding population level effects.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, Table ES-2: Please see comments above, which are applicable to Table ES-2 as well, regarding the weak or non-existing scientific foundation for any conclusions regarding importance, validity, cause and effect of any changes in X2 (salinity mixing zone), variation in timing of flow, and changes in so called flow related habitat.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, Table ES-2: We are unaware of any published scientific study that concludes that the state and federal water projects affect Delta productivity and contamination. Conclusions regarding this effect are based on conjecture and should be stricken.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, L 16: should add statement that bullets are listed in no particular order. (Same comment for page 4-3, L 12.)	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P ES-3, L 17: Should add contaminants, fishing, and ocean conditions to list of factors that will change. (sec. 4 too)	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-8, L 22: In discussion of non-native species should indicate not only that over half (30 of 58 according to page 4-13) are not native but that over 90% of the biomass in the Delta is comprised of the non-native species, to emphasize the competitive disadvantage of the natives.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-9, L 14: statement that records show sea level rise at Golden Gate as roughly 8 inches per century could be read to imply that that will continue into the future when the expectation is that that rate will increase measurably. Should state that present estimates range from X to 55 inches of potential sea level rise in the current century and that state policy is to prepare for the higher end of that range in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-14, L 8: statement that subsidence in the Delta reaches levels in excess of 20 feet should be changed to 30 feet (this change should also be made at P 4-7, L 14, and P 7-4, L 31).	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-14, L 35-36: statement about mitigation of salinity increases resulting from operations of the SWP and CVP needs more explanation as to how and why it occurs and that there is a temporal aspect to the impacts related to project operations, hydrology and drought.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-18, L 23 et. seq.: Should acknowledge in this section recent work by Jon Burau of the USGS suggesting Delta smelt distribution is not captured by existing IEP monitoring.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 7: Should be explicit that "short life span" of Delta smelt is one year for the vast majority of the species, while a small percentage seem to live for 2 years. General reader will likely assume "short" could be as much as a decade or more since tend to compare to human experience.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 18-21. The following sentences cannot be substantiated by a citation to a published scientific source: "Overall, delta smelt recruitment is poor during drought and flood years and highly variable during intermediate flow years when low salinity habitat is located in Suisun Bay. Adult abundance is always low when X2 is located in the lower Sacramento and San Joaquin rivers." There is no evidence that the location of X2 predicts delta smelt abundance. These conclusions are speculative and should be stricken.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 23: The following sentence is imprecise: "Large numbers of delta smelt are also lost to entrainment in the CVP and SWP water export facilities...." Entrainment is generally low. There have been intermittent high entrainment events in a limited number of years. To provide better context, there is also a need to add a statement that entrainment by the export facilities has never been shown to have a population level effect on delta smelt.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 24-27: The following sentence is imprecise: "In addition, the CVP and SWP water export facilities and other diversions export phytoplankton, zooplankton, nutrients, and organic material that would otherwise support the base of the food web in the Delta, thus reducing food availability for delta smelt (Jassby and Cloern, 2000; Resources Agency, 2007). The citations suggest that there is a hypothesis that the water projects divert organic material (etc.). However, there is no study that evaluates whether that hypothesis (conceptual framework) is correct, thereby indentifying the possible magnitude and effect.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 31: should add "and invasion" after "introduction" since not all non-native species have been "introduced" intentionally. Some, like striped bass certainly were introduced by choice, others like the clam have not. It would be of interest to actually list all those that were intentional and those that "invaded". Same comment applies to discussion of plants starting on L 41.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-19, L 31-37: This discussion of the food-web and the causes of decline in productivity are incorrect and need to be substantially amended. It entirely fails to discuss the factor that is believed to be primary driver of changes in food web productivity and speciation: nutrient discharges from the SRCSD Treatment Plant. Please see attached, nutrient discussion in SFCWA technical comments on draft DFG flow policy document, and the Central Valley Regional Water Quality Control Board's summary of SRCSD's tentative permit. See also Letter by Regional Board to Senator Steinberg.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-20, L 1-6: This paragraph is very weak. Should at a minimum include recent summary by Mike Johnson and Inge Werner and CVRWQCB staff reports. Also see nutrient section of SFCWA technical comments on draft DFG flow policy document. Should also reference C. Kuivula in contaminant section. Though mentioned later in the document, it would be appropriate here to also mention the newly identified food web impacts of wastewater discharges referencing information suggested above.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-20, L 23: The following sentence should be further refined: "In general, salmon and steelhead abundance has declined from historical levels and several runs have been reduced to low numbers or extirpated from some streams within their historical distributions (Yoshiyama et al., 1998; Good et al., 2005)." What time period is "historical?" If it is pre-dam, or earlier, should say so.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-21, L 10: This paragraph should mention that the SWP/CVP operations are regulated by the resource agencies to manage impacts to salmon. The impression given is that the projects simply operate and entrain fish without limit or regulation. Alternatively, most (all?) of the smaller diversions in the Delta aren't regulated.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-21, L 13-14: There is significant scientific debate regarding whether OMR flows affect entrainment of salmonids. This should be reflected in discussion.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-21, L 37: Considering assessment of PCFMC in recent years that ocean conditions have had a significant negative effect on salmon populations, this should be mentioned too as an impact to the populations in the Delta watershed.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 2-23, L 7: mention of pesticide impacts in Central and South American wintering habitats is included which seems appropriate, but the text should carry out the implication of this situation that in some sense all the efforts to restore local habitat could be for naught because of the conditions in the wintering grounds.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 3-3, L 13: Should add comment that while freshwater flows are small compared to tidal flows, project exports are relatively small compared to freshwater flows during most parts of the year depending on hydrology and significantly smaller than the combined diversions upstream and in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 3-3, L 23: This paragraph should be duplicated in the Executive Summary.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 3-4, L 3-4: The following statement is unsupportable: "The Delta of today most closely resembles a tidally varying freshwater lagoon." This statement is not supported by fact. It grossly mischaracterizes actual conditions in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 3-4, Figure 4-1: There is no reflection of upstream exports from the watershed on the Sacramento River, i.e. SFPUC and EBMUD. They should be included in the graphics.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-7, L 23: San Luis reservoir is listed even though it is an off-stream storage facility that does not capture flows that would otherwise reach the Delta. It should not be included. SFPUC and EBMUD facilities should be included, particularly because unlike the SWP/CVP reservoirs that regulate flow, these reservoirs are used primarily to capture and export flows from the watershed without contributing to the ecosystem at all.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-7, L 31-32: There continues to be significant variability on the Sacramento River. See attached, SFCWA technical comments on draft DFG flow policy document.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-10, L 1-5: at the end of line 1 add "and other factors" after "exports", on line 2 replace "has" with "have". It is important to note that there are many factors-- i.e. stressors -- reducing ecosystem complexity, not just exports.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-11, L 11-21: Paragraph describing upstream diversions should be combined with section on Dams as much seems redundant. San Francisco's Hetch Hetchy system was completed in 1934 and should be added to the list. It would be of interest to include the date when EBMUD's Mokelumne system came on-line as well.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-12, L 12-23: This discussion of groundwater should also mention that added stress is placed upon the exercise of groundwater basins as a substitute source of water in response to reduced surface water supplies and project exports and the reduction in the reliability of those supplies.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-12, L 24 et. seq.: The discussion of discharges of contaminants should be expanded to include a more detailed discussion of the nutrient and toxic discharges into the Delta. The work of Weston, Kuivula, Glibert, Dugdale, Parker, Wilkerson, etc. should be discussed. The fact that the Delta is listed for various constituents, including unknown toxicity, should also be discussed.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-17, L 13: replace “rich” with “productive”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-24, L 16: It is “Glibert” not “Gilbert”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-25, L 1-2: Temperature impacts to salmon implicate climate change, which is worth mentioning perhaps, as is done later with reference to Delta smelt.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 4-25, L 25-31: The discussion of hatcheries is confusing. It is entirely negative until the last sentence says they might be helpful. Which is it? Should be rewritten.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 6-5, Table 6-1: should add footnote to description of BDCP stating that the BDCP shall be incorporated into the Delta Plan if statutory criteria are satisfied and that it will contribute to the achievement of the coequal goals and statutory/regulatory requirements related to Delta flows.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 6-6, L 15-19: This paragraph should briefly describe that these biological opinions are the subject of ongoing litigation and the smelt opinion has already been successfully challenged with the District Court determining violations of NEPA etc. with Salmon to come.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 6-6, Table 6-2: The description of the smelt should be revised to reflect actual current regulatory requirements rather than what was proposed and successfully challenged in court. This comment applies as well to P 6-7, Table 6-2 as well dealing with the salmon opinion.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 6-8, L 18: Discussion of USACE levee vegetation policy is left hanging. A short description, discussion of the implications for such a policy with regard to ecosystem restoration in the Delta related to fishery habitat and riparian vegetation corridors etc. would be worthwhile here.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-1, L 8: Conveyance discussion should describe BDCP incorporating new conveyance, consistent with section 85020 of the Delta Reform Act and the Delta Plan incorporating BDCP subject to its satisfying statutory criteria.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-1, L 22-23: The notion that there are 160,000 acres in the “Delta-Suisun” that “could be urbanized” stretches credulity unless this is all within the secondary zone of the Delta. If so, the document should specify that.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-1, L 27: Not just increased runoff (which is usually considered to be stormwater primarily), but also increased wastewater discharges too, which should be specifically identified.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-1, L 29: It is incorrect to say that there is "increasing demand for...water supplies from the Delta." First, export supplies are not exported "from the Delta", rather they are waters diverted upstream in the Sierra and then conveyed across the Delta to the project pumping facilities. Also, deliveries to the projects are constrained by long-existing contracts and over the last decade deliveries have been decreasing generally. Consequently it is misleading to imply there is (a) increased demand on the Delta from the export areas, and (b) that even if it existing that the project contractors would actually be able to receive additional waters under current conditions. Population growth in export service areas is actually increasing demand on the development of supplies to supplement unreliable deliveries from the SWP and CVP, as well as investments in increased conservation and water use efficiency programs. The demand, related to the projects, is for increased long-term reliability of deliveries and, ultimately, when feasible as a consequence of better environmental understanding and improvements in the ecosystem, restoration of deliveries lost to regulatory proscriptions over the last twenty years or more.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-2, L 5: Discussion of climate change should also include potential for migration of species away from and to the Delta because of changes in temperature and habitat composition as a consequence of climate change and what the implications are of such movements of species.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-2, L 17-19: This sentence should be incorporated into the paragraph beginning at line 27. As it is, it's disjointed and could be interpreted to conflict with the statements made in the subsequent paragraph.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-2, L 33: This paragraph should also discuss the implications of these hydrologic changes to water management in the watershed, project operations and the need for additional storage capability if currently captured water supplies are not to be lost to flood control requirements that will result in less capability to fill and refill reservoirs because of the reduction in both the snowpack and its capability to store and slowly release water as compared to current conditions.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-2, L 37: after “temperatures” add “(e.g. salmon and Delta smelt)”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-5, L 7: This section on the SWRCB and DFG flow criteria should quote the statute rather than try to describe what is required.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-5, L 9: strike the word “new” as that implies there is some regulatory use for the criteria developed beyond informing subsequent processes.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-5, L 13: replace “develop” with “inform the development of”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-5, L 16: replace “determining new” with “identifying”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 7-5, L 17: add something along the lines of the following: “...resources if no other stressors or factors were considered and independent of the Board’s required balancing of beneficial uses and application of the Public Trust doctrine’s feasibility and public interest criteria.”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
State and Federal Contractors Water Agency	12/29/2010	ECOWP P 8-5, L 6: The Glibert citation regarding changes in nutrient loading is not “Gilbert” and needs to be separated from the Gilbert 1917 citation.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Biological Resources
The Nature Conservancy	12/23/2010	WRESWP The State Board recently developed a list identifying 127 high priority rivers and streams that are in need of instream flow protection to provide for the state’s aquatic resources. In our comment letter to the State Board, The Nature Conservancy identified an additional 62 rivers and streams that provide for important salmonid habitat and meet the State Board’s and the Department of Fish and Game’s criteria for priorities. These rivers and streams are also included in the salmon recovery plans of the National Marine Fisheries Service. Providing the water to meet public trust needs have to be considered in overall water planning for the state. In an over-allocated system, this becomes particularly challenging. This discussion should be included in the Water Resources White Paper.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources

Matrix 4 Comments Related to Ecosystem Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Yuba County Water Agency	12/13/2010	WRESWP the Council should remove the Yuba River from any list of streams that require further streamflow objectives that the Council produces or considers.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources
Yuba County Water Agency	12/13/2010	WRESWP Notwithstanding the white paper's lack of citations to DFG documents as supporting its Table 2-1, the apparent support for that table's listing of "Streams That Require Objectives Now" is DFG's May 22, 2008 rep01i "Flow Recommendations to the State Water Resources Control Board." ...That report addresses the same list of streams as Table 2-1 's list of "Streams That Require Objectives Now." That report, however, does not account for the Yuba River Accord and, for the lower Yuba River, discusses only the streamflow recommendations contained in DFG's 1991 Lower Yuba River Fisheries Management Plan. The Yuba River Accord, and its Fisheries Agreement that DFG signed, supersedes DFG's 1991 plan. Accordingly, DFG's 2008 report does not reflect the current status of fisheries management in the lower Yuba River. The Council therefore should not rely on that report in considering fisheries issues relating to the Yuba River and, ideally, should delete the Yuba River from the Water Resources white paper's Table 2-1. Failing that, the Council should not include any provisions in the Delta Plan concerning the Yuba River based upon that Table 2-1.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Biological Resources

NOTE: WRESWP - Water Resources White Paper, AGRESWP - Agricultural Resources White Paper, ECOWP - Ecosystem Resources White Paper

Matrix 5 Comments Related to Delta as an Evolving Place (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	LUSEWP Page (P) ES-3, Line (L) 26: "or" for "of"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P ES-3, L 39 & 44: What are "Delta industries"? Does that include agriculture? Confusing term, especially when first use seems to focus on water quality issues.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P ES-3, L 46: Should add statement/description of the Delta (and its levees) acting as "natural" water conveyance infrastructure for the SWP and CVP, as well as CCWD diversions, let alone other in-Delta diversions.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P ES-4, L 12: Would be beneficial to quote USGS study prediction over 2/3 chance of catastrophic failure in coming decades.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 1-1, L 11: Discussion of Delta Vision reads as if it followed from passage of Delta Reform Act when it preceded it.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 2-2, L 16: Assume "Bureau of Highways" was a state entity? Since comes amid discussion of railroads unclear. Also, assume the Bureau improved roads throughout the state and not just in the Delta, which might be inferred since paragraph about the Delta primarily	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 2-2, L 32: insert "secondary zone of" prior to "Delta"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 2-2, L 44: moderating marine influence is presumably on climate/weather, which should be stated.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 2-3, L 1 & 4: Delete "36" and "40" respectively.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 2-3, L 13 et. seq.: What does use of "important" mean with regard to farmland? Is it any land that meets any of the categories identified?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use

Matrix 5 Comments Related to Delta as an Evolving Place (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-1, L 12-14: Notion of population growth in primary zone ("Delta Islands and tracts") by 40,000 in next 20 years seems absurd on its face. The following sentence implies the growth will be in the secondary zone, but that's not what the sentence says.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-6, L 8: Again, the Delta itself is a form of "natural" infrastructure conveying water across it to the SWP/CVP export facilities, as well as CCWD's diversions. This should be included.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-8, Wastewater facilities: Sac Regional would seem appropriate to include. Is it located within the secondary zone?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-9, Infrastructure: The SWP/CVP pumping plants should be included in the listing as they are located in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-11, L 35: Need to explain how Isleton, which sits in the center of the Delta is not in the Primary Zone, i.e. that when the Delta was "defined" it was carved out. It makes no sense that the center of the Delta would be considered part of the Secondary Zone without some explanation.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-13, L 10: "along" for "on"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 3-18, L 23: Discussion of fishing should point out that most sport fish are not native to the Delta and are the subject of concern regarding predation of and competition with native species and species of concern. Also, salmon fishing is limited because of the ESA and the fall run is supported by hatcheries.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 4-2, L 26: strike "but"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-2, L 40-42: This entire sentence regarding local land use decisions "ensuring" sufficient freshwater flows should be revised. Local jurisdictions aren't the regulators of flows, that's the SWRCB's job. They do have obligations related to wastewater per the RWQCB but that's different. Perhaps it would be better to say that local land use decisions need to be consistent with requirements and regulations promulgated by the SWRCB and the RWQCB.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use

Matrix 5 Comments Related to Delta as an Evolving Place (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-2, L 44: replace “water” with “the waterscape” as that includes levees and managing flows and water quality, it’s not just the “water”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-3, L 26: “re-creation” for “recreation”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-3, L 34: delete “and costly”. Why is this included? Is it to point out the level of existing investment or the potential cost of replacement or...? As is, unclear and could potentially be read pejoratively vis-à-vis the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-4, L 3: “or” for “of”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-4, L 6: insert “extent of the” between “The” and “future”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-4, L 13: Legitimate to add that often times the costs of island reclamation are greater than the land value being reclaimed, and beyond the capability of the reclamation district to absorb.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-4, L 14: “structures” for “structure”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-4, L 17: “in furtherance of” for “and furthers”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-5, L 2: “others” for “other”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-5, L 20-23: This sentence is unintelligible and should be rewritten.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use

Matrix 5 Comments Related to Delta as an Evolving Place (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-5, L 27: "the Delta Meadows State Park" for "State Park's Delta Meadows"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-5, L 29: Though not "land" the levees also "protect" the "through-Delta" conveyance capability of the export projects and in-Delta diversions, including CCWD's. This should be mentioned as well.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-6, L 13-14: Should include potential disruption of SWP/CVP exports, CCWD and other in-Delta diversions as well.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use
State and Federal Contractors Water Agency	12/29/2010	LUSEWP P 5-6, L 44-45: Abandoned vessels also pose potential navigation hazards and risk to public safety (swimmers, water skiers, etc.).	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Land Use

NOTE: LUSEWP - Land Use White Paper

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/15/2010	AGRESWP ...the draft white paper appears to be inadequately documented, and contains numerous misleading or confusing statements, and has estimates which are quite different from the latest DWR estimates about Delta agriculture, including values in Bulletin 160-09, and preliminary estimates produced by the 2007 DWR Land Use Survey of the Legal Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP ...the second paragraph of the draft DSC report states, "Agriculture is currently the principal land use in the Delta. Total acreage in agricultural lands has declined from about 597,400 acres in 1984 to about 531,010 acres in 2008." No reference is cited for this estimate. According to the preliminary results of the 2007 DWR Land Use Survey of the Delta (given to me on Monday by Jean Woods), Delta crop acreage in 2007, excluding fallowed fields, but including "native pasture" and "mixed pasture, partially irrigated", totaled only 427,549 acres.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP From the second paragraph: "About 75 percent of the Delta's total land area is classified as Prime Farmland, which is defined as land with the best physical and chemical characteristics, and a reliable irrigation water supply." This is a rather simplistic definition. Somewhere in this report should be a better definition, such as this excerpt from the official NRCS definition: Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not excessively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/15/2010	<p>AGRESWP From the fourth paragraph (on Page ES-1): “California is the leading agricultural producer in the nation, with 14 percent of the nation’s agricultural GDP. Although the value of California’s agricultural production is large, approximately \$38 billion in 2009 (U.S. Department of Agriculture, 2010) ...” The term “agricultural GDP” is not commonly used by either economists or those who compile agricultural statistics. In more than 30 years with DWR, this is the first time I have seen that term. And the “\$38 billion in 2009” figure is not accurate. Here is how USDA, NASS, CFO (in cooperation with CDF&A) describes the size of California agriculture in 2009: California agriculture experienced a 9 percent drop in the sales value of its products for 2009. The state’s 81,500 farms and ranches received \$34.8 billion for their output last year, ...California remained the number one state in cash farm receipts in 2009, with its \$34.8 billion in revenue representing 12.3 percent of the U.S. total. The state accounted for 16.5 percent of national receipts for crops, and 6.5 percent of the U.S. revenue for livestock and livestock products. [From California Agricultural Statistics, 2009 Crop Year; USDA, NASS, CFO; December, 2010.]</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	<p>AGRESWP Starting on Line 41 of Page ES-1: “Although the exact contribution from the Delta to the state’s GDP is unknown¹, the value per acre contribution is greater than other agricultural regions in the state.” This is not correct. The Napa Valley, Salinas Valley, the Oxnard Plain, the west side of the southern San Joaquin Valley, and the Coachella Valley are all major agricultural regions in California which have seen a lot higher \$/acre average gross revenue values in recent years than the Delta. According to the preliminary results of my ongoing survey of Delta agriculture, during the 2005-09 period, the top four Delta crops, in terms of acreage, were all lower-valued field crops.</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	<p>AGRESWP From the first paragraph of Page ES-2: It has been estimated that the Central Valley region, including the Delta, contributes two thirds of the state’s agricultural value (Trott, 2007). The five-county Delta region has consistently contributed (in 2007 dollars) more than \$2 billion annually in agricultural gross value (Trott, 2008), and the most recent estimates indicate that the Legal Delta area contributes almost 25 percent of that (DWR, 2007c). These statements are misleading. Delta agriculture is only a small part of Central Valley agriculture. And although the cited DWR report was completed in February 2007, all of its statements apply to averages during the 1998-to-2004 period.</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 **Comments Related to Agricultural Resources (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/15/2010	AGRESWP Also from the first paragraph of Page ES-2: Delta agriculture contributes to at least 41 out of the 55 top-value crop exports in California. In 2008, California's agricultural exports reached an all-time high of \$12.9 billion, a 16 percent increase from 2007, and nearly a third of the Delta's total agricultural value (UC Davis, 2010). These statements are also misleading or inaccurate. Delta agriculture's contributions to almost all of the "41 out of the 55 top-value crop exports in California" have been rather minor in recent years. And if California's agricultural exports were valued at \$12.9 billion in 2008, that cannot possibly represent "nearly a third of the Delta's total agricultural value," for that would value Delta agriculture in 2008 at more than \$38.7 billion, and absurdly high number.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP From the second paragraph of Page ES-2: "... virtually every one of the crops from this diverse Delta agricultural palette, from field crops to blueberries, produces greater yields and fetches higher per unit prices than do most other growing regions of these crops in the state ..." This statement is either inaccurate or misleading. Average yields and unit prices for some common Delta crops are slightly higher than for those some crops grown in some other major California growing areas. But the above blanket statement is not be supported by official statistics. For instance, alfalfa is by far the largest crop in the Delta, with more than twice the acres of the number two crop (corn grain) during the 2005-09 period. Most of the Delta's alfalfa is in San Joaquin County, and most of San Joaquin County's alfalfa is in the Delta. The average yield for San Joaquin County alfalfa in 2009 was 6.82 tons per acre, according to the County Crop Report. Here are the average 2009 alfalfa yields for four major alfalfa growing counties in other parts of the state, according to their Crop Reports: Fresno: 7.47 tons/acre Tulare: 9.05 tons/acre Kern: 7.34 tons/acre Imperial: 7.02 tons/acre. All of these values are greater than the San Joaquin County value. The average price for San Joaquin County alfalfa in 2009 was \$120/ton, according to the County Crop Report. Here are the average 2009 alfalfa prices for four major alfalfa growing counties in other parts of the state, according to their Crop Reports: Fresno: \$124/ton. Tulare: \$109/ton. Kern: \$100/ton. Imperial: \$108/ton. One of these values is greater than the San Joaquin County value.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP Concerning Line 43 of Page ES-2: Truck crops are not any less intensive crops than are orchards and vineyards.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/15/2010	AGRESWP Concerning Lines 1 and 2 of Page ES-3: Earthquakes in the East Bay or western Delta region should be added to the list of possible "threats and future risks" facing Delta agriculture.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP Concerning Line 6 of Page ES-3: Six counties contain the legal Delta. Don't forget Alameda County, which also has agriculture in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP From Lines 17-to-19 of Page 1-2: "Draft versions of the EIR chapters that are related to the existing and projected future conditions without implementation of the Act will be provided in early 2011 for review by the Council and the public." I hope that DWR staff will be given a chance to review these draft chapters before they are released to the public.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP From Line 43 of Page 3-2: "Delta agriculture's per-acre yields are almost 50 percent higher than the state's average." This strong, sweeping, unattributed statement cannot be supported by official statistics, for statistics on average Delta crop yields are not kept. However, San Joaquin County is by far the most important county for Delta agriculture. According to preliminary results of my ongoing survey of Delta agriculture, 45 percent or more of San Joaquin County's acreage of ten important Delta crops were located within the Delta portion of the county during the 2005-to-2009 period. Average statewide yields for 2008 (the most recent year for which such estimates are available) are available for these important crops in the San Joaquin County portion of the Delta. Let us compare San Joaquin County yields with average statewide yields for 2008 for these ten crops. Yields are given in tons per acre: Dry beans 1.38 SJQ Yield 0.925 CA Yield; Corn grain 5.18 SJQ Yield 5.46 CA Yield; Alfalfa hay 6.90 SJQ Yield 7.00 CA Yield; Corn silage 27.77 SJQ Yield 26.50 CA Yield; Wheat 2.80 SJQ Yield 2.71 CA Yield; Asparagus 1.52 SJQ Yield 1.45 CA Yield; Sweet corn 5.04 SJQ Yield 8.00 CA Yield; Potatoes 16.50 SJQ Yield 19.15 CA Yield; Tomatoes, proc. 40.50 SJQ Yield 42.37 CA Yield; Pears 20.00 SJQ Yield 16.20. From the above table we can see that for five of the ten crops, the statewide average value is greater than the San Joaquin County value. And for four of the five crops where the San Joaquin County value is greater than the statewide average value, the difference is slight. The above table refutes the white paper's claim that "Delta agriculture's per-acre yields are almost 50 percent higher than the state's average."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/15/2010	AGRESWP Concerning Lines 23 and 24 of Page 3-3: Please see my above comment on how much higher the White Paper's estimate of Delta farmland is than DWR's latest estimate.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/15/2010	AGRESWP...concerning Lines 28 and 29 of Page 3-3: "About 75 percent of the Delta's total land area is classified as Prime Farmland ..." This statement is contradicted by the box just to the right of it on Page 3-3, which states that "About half of Delta land is Prime Farmland."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Table 3-1 on Page 3-4, the 19th page of the white paper: If we take the 737,676 "legal Delta acres" in 1984, and subtract out the acres of "Urban and Built-Up Land", "Other Land", and "Water", we are left with 593,583 acres of agricultural land. This figure is far above DWR's estimate of Delta farmland at that time.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Table 3-2 on Page 3-4: If we take the 737,674 "legal Delta acres" in 2008, and subtract out the acres of nonagricultural or natural vegetation, other land, confined animal agriculture, rural residential land, semi-agricultural and rural commercial land, urban and built-up land, vacant or disturbed land, and water, we are left with 541,051 acres of agricultural land. This figure is 113,502 acres greater than DWR's preliminary estimate of 2007 Delta farmland: 427,549 acres. DWR's estimate, which should be finalized in March or April, includes all cropland, plus native pasture, mixed pasture, and partially-irrigated pasture.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 3-5, Lines 5 – 7: Although the white paper's estimates of Delta farmland in 1984 and 2008 are well above DWR's estimates for those time periods, I agree with the statement, "the amount of urban land on the periphery of the Delta near Oakley, Brentwood, Tracy, and Lathrop increased noticeably from 1984 to 2008."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 3-8, Line 3: The phrase "maintaining land in agricultural use" should be changed to "maintaining land in agricultural use for a set time period, usually ten years."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	<p>AGRESWP Concerning Page 4-1, Lines 7 – 15: Using the latest BEA statistics, I have confirmed the accuracy of the paper's estimate of 2009 California GDP of \$1.9 trillion. The paper then claims that "Crop and animal production comprises almost one percent of the state's total GDP (Bureau of Economic Analysis, 2010)." One percent of \$1.9 trillion is \$19 billion. However, the same BEA table (available at http://www.bea.gov/regional/gsp/action.cfm) that lists \$1.89 trillion as California's 2009 GDP, shows the "Agriculture, forestry, fishing, and hunting" sector of California's economy as having a 2009 GDP of \$22.8 billion. For the "Crop and animal production (Farms)" subsector within the larger "Agriculture, ..." sector, the table shows only "n/a". Given how large crop and animal production is in California, compared to forestry, commercial fishing, and commercial hunting, it is quite possible that GDP from "crop and animal production" could comprise more than one percent of California's GDP. Also, the important claim that "California is the leading agricultural producer in the nation, with 14 percent of the nation's agricultural GDP" is unattributed. There is no indication if this figure applies to 2009 or 2008 or some other recent year. And it is expressed in an unusual manner ("agricultural GDP") that is not commonly used by those involved with California agriculture. Instead, here is how USDA, NASS, CFO (in cooperation with CDF&A) describes the relative size of California agriculture in 2009: "California remained the number one state in cash farm receipts in 2009, with its \$34.8 billion in revenue representing 12.3 percent of the U.S. total." [From California Agricultural Statistics, 2009 Crop Year; USDA, NASS, CFO; December, 2010.]</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	<p>AGRESWP Concerning the text box in the lower right-hand part of Page 4-1: None of these "quick facts" are attributed. Many of the terms, such as "value" and "agricultural output" are vague and not defined. The year or time period to which the estimate applies is usually not given. And the box's claim that "California agriculture represents 17% of national agricultural output" contrasts with the claim just to the left of that box that California accounts for "14 percent of the nation's agricultural GDP."</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	<p>AGRESWP Concerning Page 14-1, Line 17 to Page 14-2, Line 1: "Although the value of California's agricultural production is large, approximately \$38 billion in 2009 (U.S. Department of Agriculture, 2010), ..." This claim is contradicted by the above-cited 12/10 USDA document, with its estimate of \$34.8 billion in California farm revenue in 2009.</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-2, Line 4: There are many other, far more important, measures of “indirect economic activities related to agriculture” than the two listed here. As farm output is hauled, sorted, chilled, packed, milled, dried, canned, frozen, hulled, shelled, ginned, processed, packaged, stored, insured, marketed, and transported, it increases in value – often several times greater than its original farmgate value.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-2, Line 4: The statement that “the value per acre contribution [of Delta agriculture] is greater than other agricultural regions in the state” is either inaccurate or misleading. While there are a few important agricultural regions in California where the average gross revenue per acre value is less than that of the California Delta, there are even more regions where, year-after-year, an average or typical acre of irrigated farmland provides greater gross revenue or value than it does in the Delta. These regions include the Napa Valley, Salinas Valley, the Santa Maria River Valley, Oxnard Plain, the west side of the southern San Joaquin Valley, and the Coachella Valley.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-2, Lines 14 – 17: In addition, “virtually every one of the crops from this diverse Delta agricultural palette, from field crops to blueberries, produces greater yields and fetches higher per unit prices than do most other growing regions of these crops in the state” (California Department of Food and Agriculture, 2008). In which CDF&A document did the authors find this extraordinary statement? On the third page of my 12/15 review of the first 18 pages of the draft DSC white paper on Delta agriculture I evaluated the accuracy of this claim by comparing alfalfa yields and prices for San Joaquin County with alfalfa yields and prices for four other major alfalfa-growing regions. On the next page I compared average 2008 statewide yields for ten important Delta crops with the average 2008 yields for those crops in San Joaquin County. These comparisons did not support the above contention.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Page 4-2, Lines 18 – 20: The five-county Delta region has consistently contributed (in 2007 dollars) more than \$2 billion annually in agricultural gross value (Trott, 2008), and the most recent estimates indicate that the Legal Delta area contributes almost 25 percent of that (DWR, 2007c). The cited DWR report cannot be the source of the “almost 25 percent” estimate, for it is a Land Use Survey, which does not contain information on the value of farm output. The 25 percent claim is probably based on another DWR report, which the white paper cites as “DWR, 2007a”. That report is my 2/07 draft DWR paper, The Value of the Agricultural Output of the California Delta. That paper is based on data for the 1998-to-2004 period. It does not compare the value of Legal Delta agriculture with the value of agriculture in the five counties which contain the large majority of Delta agriculture. Instead, it compares the value of Delta farm output with farm output in all six counties which contain the Delta. It found that during the 1998-2004 period, an average of 26.4 percent of the gross agricultural revenue for those six counties came from within the Delta. If one excludes Alameda County from the list of “Delta counties”, then, according to my calculations using data from Page 5 of my 2/07 report, Delta agriculture contributed about 26.8 percent of the total gross value of agricultural output in the five counties during the 1998-2004 period. That is more than the “almost 25 percent” estimate attributed by the white paper’s authors to the 2007 DWR study	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-2, Lines 25 – 26: The text should be changed to read, “The area within the Delta has a higher percentage of field crops and a lower percentage of permanent crops such as vineyards and trees than most other major agricultural areas in California.”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-2, Lines 31 – 32: “Commodities such as turkey and eggs are likely products of Delta agriculture.” I am not aware of any turkey or egg operations in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-2, Lines 33 – 34: “Some commodities such as raisins and cottonseed byproducts may be created from Delta crops, ...” Neither raisin grapes nor cotton are grown in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Table 4-1 on Page 4-2: What is the source of the 2007 rankings of the top Delta crops by acres and gross revenues? If it is the 2007 DWR report, then that information is for the 1998-2004 period, not 2007. If it is from the County Crop Reports, then the Crop Reports for Crop Year 2009 should be consulted, for an up-to-date ranking.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-3, Line 2: "Of these agricultural jobs, nearly 25 percent are in the Delta." What is the source of this statement?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-3, Lines 17 – 32: To what year or years do these estimates apply? Because the BAE report was published in 2010, these numbers cannot be for 2010.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-3, Lines 35 – 36: "However, agricultural employment declined in the Delta between 2002 and 2008, while overall employment and agricultural exports increased." There are no published estimates for how much of the Delta's agricultural output was exported each year.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-3, Lines 8 – 10: "Adjacent to the Suisun Marsh in wetlands and lowland grasslands, grazing and grain crops are the primary agricultural land uses." One or more typos have made this sentence grammatically incorrect, and unclear in meaning.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Table 4-2 on Page 4-6: The source of this table is given as "DWR, 2007c; AECOM, 2010." The values in that table are claimed to be for 2007. Yet they obviously cannot be for 2007, if their source report was published in 2007. The cited DWR report is from the "Land and Water Use Office. Land Use Surveys." Yet I recently received from the person in charge of the DWR 2007 Land Use Survey of the Delta, a preliminary estimate of "Total Delta Crop Acreages" (including marginal crops such as "mixed pasture, partially irrigated) for 2007. That estimate is for only 427,549 acres – far below the total of 483,666 acres in Table 4-2. This issue is important, for Delta agriculture has changed a lot in recent years. For instance, according to preliminary results of the ongoing DWR survey of the value of Delta agriculture, at least 95 percent of the asparagus acreage in the six Delta counties (including Alameda) lay within the Delta during the 2005-to-2009 period. And total asparagus acreage for those six Delta counties fell from 15,700 acres in 2005 to just 7,400 acres in 2009. Also, the crop value numbers shown in Table 4-2 cannot be from the cited DWR report, for DWR Land Use Surveys do not contain estimates of the value of the crops produced on the lands being surveyed.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-6, Lines 7 – 9: “Each county reports average crop yields and prices for the entire county, not specifically for the Delta. However, crop markets are regional rather than specific to a subregion of a county, so the countywide averages for crop prices are representative.” This statement contradicts the claim, made elsewhere in the white paper, that crop yields and prices in the Delta are often higher than they are in surrounding parts of the Delta counties.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Figure 4-5 on Page 4-7: For what year or years is the information displayed in this figure? The source of the figure is a report published in 2010, so the information displayed must be from an earlier year or time period.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-8, Line 1: “As seen in Table 4-2, the top grossing irrigated crops were, in order, asparagus ...” It has been many years since asparagus has been the top grossing crop in the Delta. Preliminary results of the ongoing DWR survey of Delta agriculture has asparagus as the Number 6 ranked agricultural commodity, and fifth-ranked irrigated crop, in terms of average gross revenue during the 2005-to-2009 period.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-8, Lines 25 and 26: “The Delta has seen a significant shift to higher value permanent crops, such as fruit trees, nuts, and vineyards.” There are very few acres of nuts grown in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 4-9: The source of the two figures, which are said to apply to the white paper's five-county Delta agriculture, is cited as a DWR report which used a six-county Delta agriculture. Have the values in those figures been properly adjusted to reflect the slightly different regions being evaluated?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-10, Line 9, to Page 4-11, Line 2: The numbers cited from the DWR report apply to the six-county Delta region. They may not be accurate for the white paper's five-county Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 4-11, Line 13, to Page 4-13, Line 6: This section on “Agricultural Exports” has little relevance, because in recent years relatively little of the Delta's agricultural output has been exported, when compared to regions such as the Salinas Valley or the west side of the southern San Joaquin Valley. This has been due to the Delta's crop mix and the relatively small size of most Delta farms.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP From Page 5-1, Lines 8 and 9: "The extent and intensity of agricultural development over the past century has irreversibly changed the natural ecosystem." I suggest replacing "irreversibly" with "substantially." Leaders of the "Restore the Delta" movement argue that many of the Delta's agricultural lands can be restored to native habitat. In some areas of the Delta, such as Prospect Island, that restoration process is now underway.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 5-3, Line 8: "Row crops" should be changed to "some row crops."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 5-4, Lines 17 – 22: But can these "crops" be profitably grown in the Delta, in the manner that the study's authors envision?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning all of Section 5: Somewhere in this chapter should be a brief discussion of the effect of unscreened agricultural water diversions in the Delta on the health of the Delta ecosystem.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 6-2, Lines 9 and 10: Concerning "although the acres of land devoted to agriculture decreased in the past 20 years, the overall value of Delta crops increased." The phrase "real, inflation-adjusted" should be placed in front of "value."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP From Page 6-2, Lines 35 and 36: "The Delta's levee system continues to decline due to failing levee integrity and subsidence." This blanket statement is not accurate. The condition of many Delta levees has been significantly improved in recent years, thanks in part to State-funded levee maintenance and improvement programs.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-2, Lines 41 and 42: Where did this experiment occur? How long did it take to build up the peat soil by "up to two feet"?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-3, Lines 1 – 7: The risks of sudden levee failures due to an earthquake in the Bay Area or the Delta should be discussed in this section.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP From Page 6-3, Lines 12 – 15: Cotton is not grown in the Delta. And overall, global warming throughout this century would be bad news for Delta wine grape growers.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-4, Line 7: The word "local" should be put in front of "coalition."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-4, Lines 10 – 19: Some of this text is not very relevant to the Delta. More should be said about the unique water supply issues facing Delta growers.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-4, Lines 40 – 42: There must be one or more typos or missing words in this sentence. As written, it makes no sense.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Section 7, References: The references in this report are more numerous and complete than in most similar reports I have read over the years.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
California Department of Water Resources	12/20/2010	AGRESWP Concerning Appendices A and B: The material in each of these sections was obviously copied from other documents. Those documents should be cited in these appendices.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Most of the statistics cover the five counties whose boundaries extend into the Delta, but the data are not limited to the portions of those counties actually within the Delta. herefore, it is difficult to get an accurate picture of what is happening within the "legal" Delta, which is what is most critical for development of the Delta Plan	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP We believe that the Delta Ag White Paper's biggest flaw is that it fails to comprehensively examine the sustainability of agricultural practices within the Delta. However desirable agriculture and open space are within the Delta, the Delta Plan must incorporate sustainable activities, including a comprehensive examination of the economic and ecological sustainability of agriculture in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Much of the property in the Delta lacks surface water rights; this is an issue that has been raised before the State Water Resources Control Board on numerous occasions and is well documented in various reports, but action has been very slow to address the substantial number of illegal and unpermitted diversions that occur in the Delta. In addition, there is increasing use of groundwater as a substitute for surface water (likely because of quality concerns) to irrigate Delta agriculture in certain areas. Many of these groundwater basins are overdrafted, making this practice nsustainable. Consideration should be given to the source of water for irrigating Delta agriculture in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Much of the water used to irrigate Delta agriculture is piped onto the Delta islands through unscreened diversions. Again, this issue has been documented in the past by the Department of Fish and Game and other State entities, but no action has been taken to address the impacts on fish species in the Delta as a result of the unscreened diversion facilities. It is hard to believe that water diversions from the Delta that are unscreened can be part of a sustainable agricultural industry and a restored Delta ecosystem.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Biological Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Many farming operations in the Delta return untreated runoff irrigation water containing both pesticides and excess fertilizer back into the Delta without any treatment.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP Decreasing land levels due to the oxidation of peat soils and compaction from heavy equipment also need to be considered within the context of a sustainable agricultural industry in the Delta. Although research indicates that soil levels can be improved with certain agricultural practices, these practices do not appear to be widely practiced within the Delta and may only be possible with certain crops. A detailed map survey of the Delta showing property currently being farmed that is significantly below sea level and the crops grown on those lands would be helpful in assessing agricultural practices within the Delta and formulating the agriculture components of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	AGRESWP The sustainability of agriculture in the Delta must also consider the protection offered by levees, which in many cases are increasingly susceptible to failure due to the fact that soil levels are increasingly farther below sea level. It is well documented that Delta levees have failed in the past and are increasingly likely to fail in the future. The cost of maintaining the levees in the future, especially if funded by the general public, may be a significant challenge that should be considered in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management
Coalition for a Sustainable Delta	1/7/2011	AGRESWP The Delta Plan also needs to recognize those areas within the Delta subject to salinity accumulation as a result of past and current farming operations. Again, it may not be possible for these areas to be farmed sustainably into the future and this should be taken into account in the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Coalition for a Sustainable Delta	1/7/2011	AGRESWP The Delta Ag White Paper indicates that corn is a major crop in the Delta; to the extent that the corn produced in the region is subsidized under Federal agricultural subsidies, on property that is protected by levees whose maintenance also requires significant federal or State funds, continued cultivation of this and other similar commodities does not make economic sense. We encourage the Council to take a hard look at the economic sustainability of agricultural practices in the Delta in formulation of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Coalition for a Sustainable Delta	1/7/2011	WRESWP Section 3 – Water Supply Development (p. 3-5): The discussion of agricultural discharges should include discussion of the lack of a long-term drainage solution for the area west of the San Joaquin River and the ongoing litigation involving this issue.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Water Resources and Agricultural Resources
Resident of Delta	12/27/2010	AGRESWP Generally speaking, I think the paper, while heavy on statistics, fails to capture the history and importance of the agricultural development of the Delta. This could be accomplished by making the following revisions: [Except as noted, the comments will not be made with reference to page and line because of their general nature.]	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Resident of Delta	12/27/2010	AGRESWP The paper would benefit from a clearer and more thorough explanation of the original patenting of the Delta lands as "swamp and overflow lands" pursuant to the grant of the Delta area to the State under the Federal Arkansas Act. This program was parallel to the Homestead Acts which passed much of the lands in the Southwestern United States into private ownership in small acreages to accomplish the ideals of the agrarian society which were then widely held. Although the original acreage limitations were successively expanded in order to meet the economic realities of levee building, the original grants at \$1 per acre (refundable upon evidence of reclamation works) were clearly intended to extend farm ownership to western migrating families and/or veterans. The initial attempts to reclaim lands in the lower Delta were largely unsuccessful until the clam shell dredger became available, enabling river bottom sediments to be used for levee construction in lieu of peat soils. Reclamation Districts were formed to assist in the bond financing of the reclamation works which enabled numerous landowners to work together on the reclamation of a large island.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP Almost all of the current Delta levees were constructed by 1910. Thus, the Delta as we know it today has existed behind levees for over a hundred years and the implication that changes have occurred "over the last century" is generally erroneous. Although the organic soils behind the developed levees have eroded and subsided in the interim, the farming practices have, generally speaking, remained the same. These nitrogen rich soils, subject to periodic catastrophic flooding, are largely farmed today as they were a hundred years ago; to wit: irrigating through flood gates or siphons by methods of sub-irrigation while maintaining farmable soil layers to a depth of 3 or more feet through on-island drainage ditches and canals with drainage waters returned to adjacent channels by pumping. Although substantial portions of the Delta uplands on the peripheries of the Delta have been converted to permanent crops (especially grapes, pears, and some walnuts), most of the lands continue to produce the same or similar crops. Originally, the Delta produced mostly potatoes, onions, alfalfa, wheat and other small grain crops. Specialty crops like canning tomatoes and asparagus came later. [Strangely, potatoes are not mentioned in the current draft. The common practice in the Lower Delta was to lease newly leveed lands to George Shima who would clear, level and ditch the newly reclaimed lands with his considerable teams of horses and Chinese labor in return for 3 years rent-free to produce potatoes.]</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management
Resident of Delta	12/27/2010	<p>AGRESWP At several points in the current draft, the statement is made that 313,000 acres of former wetlands were put behind levees. [believe this creates a misleading impression. When the Federal Government surveyed the Delta and designated it as "swamp and overflow lands" most of the land lay above or close to sea level and was not considered tidal wetlands. You may wish to contact George Basye, formerly of the Downey, Brand law firm, who has made quite a study of the distinction between swamp and overflow lands and tidal wetlands in the Delta. The significance of this, in my mind, is that the changes which occurred through reclamation are not as significant as intimated because of agricultural practices undertaken after reclamation, which included seasonal flooding of harvested crop lands for weed suppression and salt removal, were not radically altered. And, in fact, most of the historical surveys of both fish and avian population in the Delta indicate that healthy populations of anadromous and other native and introduced fishes as well as water fowl and other migratory and native birds continued to exist in the Delta for many generations after reclamation was essentially complete.</p>	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management

Matrix 6 Comments Related to Agricultural Resources (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	AGRESWP Farming in the Delta actually conserves water. Evapotranspiration from water surfaces in the Delta exceeds 5 feet annually, whereas crop irrigation, especially through sub-irrigation which does not flood the surface, consumes 3 feet or less, depending upon the crop. Thus, if the agricultural lands were flooded, more fresh water would be consumed. In addition, phreatophytes (tules, hyacinths and other water loving plants typical of flooded lands) generally consume about 8 feet of water.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Resident of Delta	12/27/2010	AGRESWP In Section 6, page 6-4, the paragraph entitled "Water Supply" is generally inapplicable to the Delta. The ground water generally available underlying Delta soils is of unsuitable quality for use either as irrigation water or human consumption.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Resident of Delta	12/27/2010	AGRESWP Also, in Section 6 ,at page 6-3, in the paragraph entitled "Water Quality" agricultural run-off is identified as "one of the main sources of water and soil contamination in the Delta." While this may be true, the source of the contamination is typically upstream of the Delta from ocean salts exported to the San joaquin Valley by the Central Valley Project, native soil constituents leached from the irrigated lands of the San joaquin Valley (including selenium and boron), and chemicals added in agricultural and urban uses, and drained into the Delta through the San joaquin River. Because of the high nitrogen content of the native Delta soils and the lack of conditions suitable for tree and vine crops, many of the fertilizers, herbicides and pesticides found in the waters of the Delta are contributed elsewhere. The same criticism applies to the text found in Section 5, from page 5-2 line 26 to page 5-3 line 5.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Water Resources
Resident of Delta	12/27/2010	AGRESWP Some emphasis is placed on the value of crops exported from California with implied criticism that the Delta is not generating crops for export. In actuality, there is a net demand for most of the crops grown in the Delta within the State of California, thus accounting for the relative lack of export. In this day and age, growing crops that you actually need in your area might be considered admirable.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources
Resident of Delta	12/27/2010	AGRESWP The discussion of the relationship between the five Delta Counties' General Plans and the responsibilities of the Delta Protection Commission seem contradictory. The facts are that the land use plan adopted by the Delta Protection Commission is incorporated, in effect, by each of the Delta Counties, thus constituting regional planning on a Delta-wide basin.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources

Matrix 6 **Comments Related to Agricultural Resources (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP In Section 6, at pages 6-2 to 6-23, in paragraphs entitled "Subsidence" and "Levee Failure" dire predictions are made for levee failures. In fact, since the State instituted a program of cost-sharing for Delta levee maintenance and rehabilitation, the incidence of catastrophic levee failures in the Delta has been noticeably reduced. Much of the organic soil in the Delta has already been eliminated by oxidation and wind erosion, greatly reducing in area the portions of Delta islands which continue to subside. Seismic failures are unknown and are speculative at best. Sea level rise began to occur according to records compiled over the last 100 years and levee maintenance and rehabilitation appear to have more than kept pace with it. This paper, along with much of the other information promulgated by the Dept. of Water Resources, paints an overly grim picture of the ability of the Delta to overcome natural forces, especially when viewed against the experiences of the Netherlands where there is a real determined effort to adjust to the same conditions.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>
Resident of Delta	12/27/2010	<p>AGRESWP The Paper needs to recognize to a much greater extent the fact that the Delta provides an almost unique example of integration of agricultural, recreational, environmental uses, unlike almost any other agricultural area in the Western United States at least. The legacy communities, as well as the growing populations and the large urban areas close by the Delta, make the Delta an economic engine and recreational resource which may be irreplaceable, especially when considering the network of transportation and utility corridors constructed through the area.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources</p>

NOTE: WRESWP - Water Resources White Paper, AGRESWP - Agricultural Resources White Paper

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP From Page 6-2, Lines 35 and 36: "The Delta's levee system continues to decline due to failing levee integrity and subsidence." This blanket statement is not accurate. The condition of many Delta levees has been significantly improved in recent years, thanks in part to State-funded levee maintenance and improvement programs.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-2, Lines 41 and 42: Where did this experiment occur? How long did it take to build up the peat soil by "up to two feet"?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-3, Lines 1 – 7: The risks of sudden levee failures due to an earthquake in the Bay Area or the Delta should be discussed in this section.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Coalition for a Sustainable Delta	1/7/2011	AGRESWP The sustainability of agriculture in the Delta must also consider the protection offered by levees, which in many cases are increasingly susceptible to failure due to the fact that soil levels are increasingly farther below sea level. It is well documented that Delta levees have failed in the past and are increasingly likely to fail in the future. The cost of maintaining the levees in the future, especially if funded by the general public, may be a significant challenge that should be considered in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP In this memo I make four points that build upon information presented in the whitepaper and are intended to help the Council in their preparation of the Delta Plan: • Levee fragility, including the different potential causes and consequences of levee failure, is highly variable in the Delta. Therefore, one-size-fits-all levee policies are unlikely to be successful. • Current levee policy is driven by state and federal levee standards that are uniformly applied, regardless of risk. This leads to inefficiencies at mitigating risk and is unlikely to perform well under changing future conditions. • Risk-based approaches, which seek to make strategic investments that yield the highest risk reduction, are likely to be most successful, as well as transparent and objective. • To date, all planning efforts have failed to consider that it is more economically efficient to allow some islands to remain flooded following levee failure. New policies need to be established that address this.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP Generally poor construction standards and weak foundations make the levees prone to seepage and settling. In addition, rising sea level, increasing frequency and magnitude of floods, and continued island and levee subsidence are progressively reducing levee reliability. Finally, despite the protestations of some Delta stakeholder groups and their engineers, there is compelling evidence that earthquakes are a major threat to levee stability in the region.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP It is important to remind policymakers that levee stability is not uniform throughout the Delta. Threats to levees in the North and South Delta are primarily associated with high winter and spring flood inflows from the Sacramento, Mokelumne and San Joaquin Rivers. In contrast, most levees in the Western and Central Delta are prone to failure during extreme high tides and winds, and are at higher risk of failure due to earthquakes. In addition, there is high local and regional variability in levee foundations and construction standards, along with regional differences in rates of island subsidence. Finally, land uses, along with land and asset values, are highly variable throughout the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP These regional differences will be amplified by on-going changes in conditions. Rising sea level disproportionately affects the Western and Central Delta, principally through the increase in frequency and magnitude of extreme high tides. Conversely, changes in runoff patterns, along with flood management operations, are having their greatest impact in the Northern and Southern Delta, where tides are less important. These regional variations, both now and in the future, suggest that one-size-fits-all approaches to levee policies are unlikely to be effective at managing risk under changing conditions.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP The whitepaper gives limited information on the costs involved in adapting the Delta levee network to existing and future conditions. Yet, after public safety, this is likely to be the single most important factor to be considered in developing levee policy within the Delta Plan. The costs of doing anything, as well as nothing, are very high. The economic activity of the Primary Zone is insufficient to support its current levee network, much less mitigate future conditions. For this reason, along with compelling state interest in protecting water supply, energy and transportation infrastructure, the Delta levee system will rely on significant state and federal subsidies for the indefinite future.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP With the exception of the Special Projects program, current levee policy is a one-size-fits-all approach. The Subventions Program, Hazard Mitigation Plan (HMP) standards and PL 84-99 standards are uniformly applied, regardless of the value of assets protected by the levees. As the Council well knows, there is considerable pressure to invest state bond funds in bringing all non-project levees up to the PL 84-99 standard. This upgrade, exceeding \$600M (but likely approaching more than \$1B) reduces the likelihood of levee failure due to flooding by approximately 10% (Suddeth et al., 2010). Since these monies would be spread evenly across the Delta, they do little to reduce aggregate risk since investments are made equally in areas with low or high asset values. Additionally, these upgrades provide only marginal benefits in protection against earthquakes.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP As has been documented by numerous reports, the region's hydrology is changing, leading to increasing flood frequency and magnitude. Hydrologic baselines are shifting, creating a constantly moving target for levee standards. To illustrate the nature of this problem, the current levee height standards are based on hydrologic conditions as measured in 1986. To my knowledge, that standard, as applied to current levees, has not been updated. As outlined in the DRMS reports and in the flood risk whitepaper, the new hydrology, based on 20+ years of additional data, indicates a substantial increase in the elevation of the 1% flood. This means that even if \$1B is invested in order to bring all the levees up to the 1986 PL 84-99 standard, the levees would be out of compliance, pending recalculation of the 1% flood. Moreover, as sea level rise and inflows continue to change, the elevations are likely to be frequently revised upward. Thus, changing hydrology, by periodically placing most Delta levees out of compliance with PL 84-99 standards, creates continuous demand for distributing funds broadly rather than strategically, perpetuating inefficiencies in levee investments to reduce system-wide risk.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP As highlighted in the comprehensive review of California levee policy by Galloway et al. (2007), the argument was made that risk-based (rather than standards-based) approaches are needed to guide levee investments. One approach offered by Suddeth et al. (2010) informs and simplifies the process of prioritizing risk reduction investments. Based on the and and asset values of islands, along with the probability of levee failures, Suddeth et al. (2010) use economic decision analysis to identify those islands that do or do not warrant levee upgrades and/or repair following levee failure. This approach formally incorporates risk—the likelihood of flooding x the economic consequences—into decisions. In effect, those islands for which it makes economic sense to repair or upgrade levees are those islands where levee investments yield the greatest impact at reducing aggregate risk. These islands typically contain key infrastructure and/or high value agricultural land. The approach presented by Suddeth et al. (2010) provides only a first step. It does not include additional ecosystem services of the Delta that relate to levee stability. For example, several islands in the Delta provide critical habitat for sensitive or listed terrestrial species. In addition, under current export pumping regimes, the five western islands play a significant role in maintaining low Delta salinities ⁴ . The economic value of these services can eventually be incorporated into the economic decision analysis. However, for the purposes of developing the initial Delta Plan, the Suddeth et al. (2010) approach allows for an objective, Delta-wide comparison of the value of potential levee investments.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP Current policy dictates that the state will only participate in repair of flooded islands if it is deemed to be in the state's interest. All factors, including sea level rise, subsidence, increasing winter inflows, earthquakes and most importantly the costs of upgrading and repairing levees, suggest that under this policy some islands will be allowed to remain flooded following levee failures. It may well be that the evolution of the Delta as place, as outlined in the 2009 legislative package, will be defined by which islands are or are not restored following levee failures. One approach to dealing with the issue of permanently flooded islands is to let the stochastic nature of island failures play itself out, with restoration being determined on a case-by-case basis under current state policy. This "fail into a solution" approach may be the simplest and most politically expedient for the purposes of the Delta Plan. An alternative approach would be to link together the plan for future levee investments with a long-range plan for allowing some islands to remain flooded once levees fail or, alternatively, to choose to pre-flood islands under controlled conditions to reduce impacts. This approach would be controversial and fraught with a number of legal hurdles. However, this approach meets two important criteria for managing changing conditions in the Delta. It identifies where targeted levee improvements are likely to be needed to mitigate the increases in levee vulnerability due to flooding of adjacent islands. It also allows for the development of long-term programs to reduce or mitigate third-party impacts.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP the Council will also need to consider how to prioritize investments in levees in the Delta in a way that achieves the greatest economic efficiency. One approach (of many) is to move away from the use of uniform standards tied to the 1% annual probability flood, which effectively transfers risk to the state and federal government, and toward targeted investments that yield the greatest reduction in overall risk. Economic decision analysis is a transparent, objective way to achieve this. From a policy perspective, the most challenging aspect of an approach like this is the likelihood that a modest number of islands will eventually be allowed to remain flooded. The Plan may choose to assess whether islands should remain flooded on a case-by-case basis, or anticipate, if not prescribe which islands remain flooded. The latter case allows for the reduction of landowner and third-party impacts.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP The paper would benefit from a clearer and more thorough explanation of the original patenting of the Delta lands as "swamp and overflow lands" pursuant to the grant of the Delta area to the State under the Federal Arkansas Act. This program was parallel to the Homestead Acts which passed much of the lands in the Southwestern United States into private ownership in small acreages to accomplish the ideals of the agrarian society which were then widely held. Although the original acreage limitations were successively expanded in order to meet the economic realities of levee building, the original grants at \$1 per acre (refundable upon evidence of reclamation works) were clearly intended to extend farm ownership to western migrating families and/or veterans. The initial attempts to reclaim lands in the lower Delta were largely unsuccessful until the clam shell dredger became available, enabling river bottom sediments to be used for levee construction in lieu of peat soils. Reclamation Districts were formed to assist in the bond financing of the reclamation works which enabled numerous landowners to work together on the reclamation of a large island.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>
Resident of Delta	12/27/2010	<p>AGRESWP Almost all of the current Delta levees were constructed by 1910. Thus, the Delta as we know it today has existed behind levees for over a hundred years and the implication that changes have occurred "over the last century" is generally erroneous. Although the organic soils behind the developed levees have eroded and subsided in the interim, the farming practices have, generally speaking, remained the same. These nitrogen rich soils, subject to periodic catastrophic flooding, are largely farmed today as they were a hundred years ago; to wit: irrigating through flood gates or siphons by methods of sub-irrigation while maintaining farmable soil layers to a depth of 3 or more feet through on-island drainage ditches and canals with drainage waters returned to adjacent channels by pumping. Although substantial portions of the Delta uplands on the peripheries of the Delta have been converted to permanent crops (especially grapes, pears, and some walnuts), most of the lands continue to produce the same or similar crops. Originally, the Delta produced mostly potatoes, onions, alfalfa, wheat and other small grain crops. Specialty crops like canning tomatoes and asparagus came later. [Strangely, potatoes are not mentioned in the current draft. The common practice in the Lower Delta was to lease newly leveed lands to George Shima who would clear, level and ditch the newly reclaimed lands with his considerable teams of horses and Chinese labor in return for 3 years rent-free to produce potatoes.]</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP At several points in the current draft, the statement is made that 313,000 acres of former wetlands were put behind levees. [believe this creates a misleading impression. When the Federal Government surveyed the Delta and designated it as "swamp and overflow lands" most of the land lay above or close to sea level and was not considered tidal wetlands. You may wish to contact George Basye, formerly of the Downey, Brand law firm, who has made quite a study of the distinction between swamp and overflow lands and tidal wetlands in the Delta. The significance of this, in my mind, is that the changes which occurred through reclamation are not as significant as intimated because of agricultural practices undertaken after reclamation, which included seasonal flooding of harvested crop lands for weed suppression and salt removal, were not radically altered. And, in fact, most of the historical surveys of both fish and avian population in the Delta indicate that healthy populations of anadromous and other native and introduced fishes as well as water fowl and other migratory and native birds continued to exist in the Delta for many generations after reclamation was essentially complete.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>
Resident of Delta	12/27/2010	<p>AGRESWP In Section 6, at pages 6-2 to 6-23, in paragraphs entitled "Subsidence" and "Levee Failure" dire predictions are made for levee failures. In fact, since the State instituted a program of cost-sharing for Delta levee maintenance and rehabilitation, the incidence of catastrophic levee failures in the Delta has been noticeably reduced. Much of the organic soil in the Delta has already been eliminated by oxidation and wind erosion, greatly reducing in area the portions of Delta islands which continue to subside. Seismic failures are unknown and are speculative at best. Sea level rise began to occur according to records compiled over the last 100 years and levee maintenance and rehabilitation appear to have more than kept pace with it. This paper, along with much of the other information promulgated by the Dept. of Water Resources, paints an overly grim picture of the ability of the Delta to overcome natural forces, especially when viewed against the experiences of the Netherlands where there is a real determined effort to adjust to the same conditions.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>
State and Federal Contractors Water Agency	12/29/2010	<p>EMERGPRWP ES-1 Bottom: Should add some language about the integral role the Delta plays as part of conveyance for the SWP and CVP and the need to prioritize recovery of water export capability as soon as life and property secure. In many instances the State's interest could very well be in restoring exports as soon as possible rather than reclaiming a particular island.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management</p>

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP ES-2 End of last paragraph: Add some language discussing the resulting need to undertake an assessment and determination of rehabilitation priorities in the case of levee failure(s) and the use of a "beneficiary pays" overlay on such considerations.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 1-1 Paragraph (P) 2, Line (L) 1: at end of line add "today" after "Delta".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 1-1 P 3, L 6: insert between "affected area" and "as well as", add something along the lines of "reestablish, if necessary, the ability to move water to and through the State Water Project and the federal Central Valley Project export facilities"	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-3 P 3, last Line prior to Emergency Response section: Add information regarding the cost to DWR of closing the breach. Identify the resale value of the land behind the levee being protected and reclaimed. Of the cost paid by DWR, how much did the Reclamation District contribute? The water contractors?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-3 P 4, L 1: between "emergencies" and "are" insert "in the Delta".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-4 P 2, last Line: mention "DWR Joint Flood Operations Center" – "Joint" with whom? Should identify.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-5 P 4, L 2: state DWR Division of Flood Management has various responsibilities, should clarify whether that's statewide or in the Delta or in the Central Valley or...?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-5 P 4, L 3: mention "State-Federal Flood Operations Center", is this the same as the "Joint Food Operations Center" mentioned on 2-4? Should be consistent in usage.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-5 Heading with FEMA: Why isn't DHS included in the heading?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 2-5 last P: What's NIMS? NRF?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 3-2 P 3, L 7: between “levees” and “flood” insert “water export capability”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 3-9 P 1, L 2 & 3: Use of “Joint” vs. “State-Federal”? Also, is DWR’s jurisdiction on flood management statewide or is it limited to the Delta, the Central Valley, ...?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 3-9, DWR section: The following should be included to provide more detail regarding DWR planning activities: DWR is preparing a Delta Flood Emergency Preparedness and Response Plan (EPRP) in coordination with the U.S.Army Corps of Engineers. The EPRP covers a wide range of emergency response strategies ranging from isolated levee failures, up to and including catastrophic multiple-island failures causing severe water export disruptions. A consensus strategy for response to a plausible catastrophic multiple-island failure scenario is the restoration of an emergency freshwater pathway through the Delta to water export facilities in approximately 6-months. The implementation of this Pathway strategy includes the stockpiling of rock, other breach closure materials and proactive Pathway levee improvements to reduce the magnitude of slumping after an earthquake.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 3-10 last P, L 1: Use of term “project levees” is confusing without more definition. These are not levees associated with the water projects, they are levees that are part of the Army Corps flood control projects in the Delta. The appropriate definition should be included or at least footnoted.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	EMERGPRPWP 3-12 P 4 : discussion of USACE policy regarding vegetation should include mention of possibility of exceptions being granted (e.g. SAFCA/Natomas) and the potential implications for habitat and ecosystem restoration in the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P ES-2, L 2: Statement that “some islands 12 to 15 feet below sea level” understates the problem because there are some areas that are 30 feet below sea level.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P ES-2, L 15: missing word > “as well as to simply some of the”?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P ES-2, L 28: statement “authorized under state lands” doesn’t make sense. Should it be authorized by the State Lands Act or something else...?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-1, L 26: “as much as 25 feet below sea level” understates the problem because there are some areas that are 30 feet below sea level.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-2, L 6: delete second “Delta”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-2, L 12: again, reference to 10-15 feet below sea level rather than 30 feet below.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-2, L 19: Here or someplace in the paper there should be a discussion of the often striking variance between the cost of maintenance and repair and the value of the lands being protected. In addition, the problem that often the local districts simply can't afford to repair or keep up with maintenance because of the lack of the ability to spread costs and the relative lack of financial resources is an important issue to identify. These problems, along with Paterno, etc. illustrate the question of if the levees are to be maintained then who should pay and can those who benefit the most directly afford to do so, and how benefits are measured and beneficiaries potential cost allocations established, including more generalized state benefits.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-3, L 8: Though done later, the fact of sunny sky failures should be included here too, identifying rodents and burrows, insufficient maintenance because of insufficient resources or regulatory hurdles etc. as causes of levee failures.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-3, L 38: Should be “The” rather than “These” because only (a) above is the coequal goals, (b) – (d) are not part of it.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-4, L 15: What does “to this objective” refer to? It is unclear.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 1-4, L 28: add "in the Delta" after "risk".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-1, L 7: project water supplies are not "exported from the Delta", they are waters diverted upstream and conveyed through the Delta to the pumping facilities. It would be better to say "almost 25 million people rely on waters conveyed across the Delta for at least some of their drinking water, just as much of the State's agricultural and industrial economies rely on such supplies."	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-1, L 9-10: The statement that "the other coequal goal of restoring the Delta's ecosystem would remain dependent upon the integrity of the levee system" is wrong and implies a position that the coequal goals require maintaining the present levee system in perpetuity. We disagree with such a position and believe that as an "evolving place" there will no doubt be changes in the Delta's geometry, levees and land uses consistent with meeting the coequal goals of water supply and ecosystem restoration.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-1, L 12-13: As with the statement on L 9-10, the assertion that "The Delta as an evolving place would not be without an evolving levee system" should be clarified as to what the implications of such a statement are and are not.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-3, L 12: insert "as" between "to" and "the" at the end of the line.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-3, L 15-16: The sentence beginning with "Any" is redundant to prior sentence and should be deleted.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-6, L 12: Substitute ", and some as much as 30 feet," for "feet" currently between "15" and "below".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 11: Insert "Central Valley" between "California's" and "federal".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 12: Add “, of which 385 miles are in the Delta” after “projects”. Phrase “discharges flood flows” is awkward and doesn’t really convey what is intended.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 14: While dams and reservoirs do “affect” flooding in the Delta in a way, it might be better to substitute “flood management” for “flooding”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 15: Substitute “that would otherwise reach” for “in”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 17: Should be “streams” not “stream”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-10, L 19: This line says levees increase peak flows while L 15 said dams reduce peak flows. While both statements are correct it’s confusing. Suggest both paragraphs L 14-19 be reworked for clarity.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-13, L 5: Suggest deleting “or to the forebays of water supply projects”. This is confusing and not really where water is “discharged” to.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-13, L 6: Replace “drainage” with “natural runoff” or make a different change. Use of “drainage” could be implied to include urban stormwater runoff etc. Perhaps better to say “40 percent of the lands of the state contribute runoff to the Delta watershed” or something along those lines.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 2-13, L 15-16: Sentence about State turning over maintenance should clarify whether under Paterno the State is still subject to liability or not, identifying the difference whether the local agency is maintaining project or non-project levees.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-1, L 4: substitute “boundary of the Delta” for “limit”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-1, L 12-13: This bullet should split out population figures for primary and secondary zones rather than just saying 450,000.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-1, L 14: Per previous comment, the Delta is not the “source” of waters used by the SWP and CVP. Export supplies are diverted far upstream in the Sierra, stored for release and then conveyed to and through the Delta to the projects’ pumping facilities. It is correct to state the Delta is the “source” of water for CCWD and in-Delta diverters. This distinction should be reflected in the text.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-5, L 16: Solano County should be identified as a user of the North Bay Aqueduct.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-5, L 22-24: This bullet calling out the South Bay Aqueduct should be deleted. The SBA begins downstream of the SWP facilities at Banks and has no effect on the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-5, L 26-27: Insert “Southern” between “the” and “Central Valley” and “the Bay Area” between “Coast” and “and”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-5, L 30: Insert “south of the Delta” between “Valley” and “most”, and add after “purposes”, “and for agricultural and other uses in the Silicon and Pajaro valleys.”	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-8, L 14: The purpose of the sentence beginning with “Note” is unclear and perhaps should be deleted or the paragraph reworked to better make whatever the point was about “different data”. The second “note” on L 16 makes sense.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-8, L 28: replace “floods” with “flows” at the end of the line.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-13, L 10: replace the second “flooded” with “protected” as it wasn’t the levee that flooded the island it was the water the levee didn’t protect the island from.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-13, L 12: It would be good to add information after the last sentence regarding how much the state (DWR) spent on the repair, how much of that was paid for by the State Water Contractors, and how much the reclaimed lands were/are worth.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-15, L 11-13: Sentence about “statewide interest” is accurate but might be good to add another sentence identifying the reality of climate change and sea level rise making it imperative that we work to both adapt to changes and prepare for a time when such “combat” against salinity may not be feasible.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-15, L 21-22, 23: clause beginning with “which” is repeated so one needed to be deleted, also, on L 23 “they” should be “the”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-16, L 7: While state will provide funding up to \$20K/mile, would be good to let the reader know what the actual cost range is for maintaining or rehabilitating a mile of levee.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-16, L 12: Insert “program” between “Projects)” and “provides”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-16, L 17-18: Statement that intent of Special Projects program “is to preserve the Delta as much as it exists at the present time” should be put in context of current policy that the Delta is an “evolving place”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-17, L 24: Insert “out” between “carried” and “with”.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-18, L 5-6: Statement should be more clearly written that there’s a problem in that though the state has additional resources available for helping to fund levee activities, the local agencies are limited in what they can generate to meet costshare requirements resulting in delay of work that could otherwise move forward.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 3-18, L 6-8: The recommendations beginning with “Consideration” should be deleted as they are out of place in this background paper and raise significant issues related to equity, implications for flood management projects elsewhere in the state, etc.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 4-6, L 19: Suggest a footnote regarding vegetation policy and the implications of its application for ecosystem restoration activities in the Delta as well as the current work regarding an exception for California or certain projects in California.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-1, L 7-10: Relating probability to gas pipeline explosion seems insensitive to recent tragedy in the Bay Area.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-2, L 7: should be "built" not "build".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-7, L 20: should be "than" not "that".	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-24, L 14: Add "increased peak flood flows" to the list of increased risks and it should be added to list of factors leading to increased consequences too.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-25, L 18-20: This paragraph should be reworked for clarity. Oxidation makes the "island" deeper, more water can flood into it if there's a levee breach/failure and depending on when it occurs it could draw saline water into the flood "island" or draw more saline water further upstream from the Bay. As written, it assumes knowledge of the lay reader that probably isn't there.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
State and Federal Contractors Water Agency	12/29/2010	FLDRSKWP P 5-31, L 26: Section regarding statewide economic impacts should also discuss (or make a separate bullet) the impact of catastrophic failure on the budget since it could take billions of dollars to repair the Delta after a multi-island failure, if it is decided to do so. In addition to the hit to state and federal coffers, local agency budgets will be impacted as would water agencies that depend on water sales of exported supplies for revenue. In essence, this section should discuss the postcalamity impact to budgets as well as the economy generally.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP From Page 6-2, Lines 35 and 36: "The Delta's levee system continues to decline due to failing levee integrity and subsidence." This blanket statement is not accurate. The condition of many Delta levees has been significantly improved in recent years, thanks in part to State-funded levee maintenance and improvement programs.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-2, Lines 41 and 42: Where did this experiment occur? How long did it take to build up the peat soil by "up to two feet"?	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
California Department of Water Resources	12/20/2010	AGRESWP Concerning Page 6-3, Lines 1 – 7: The risks of sudden levee failures due to an earthquake in the Bay Area or the Delta should be discussed in this section.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Coalition for a Sustainable Delta	1/7/2011	AGRESWP The sustainability of agriculture in the Delta must also consider the protection offered by levees, which in many cases are increasingly susceptible to failure due to the fact that soil levels are increasingly farther below sea level. It is well documented that Delta levees have failed in the past and are increasingly likely to fail in the future. The cost of maintaining the levees in the future, especially if funded by the general public, may be a significant challenge that should be considered in development of the Delta Plan.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP In this memo I make four points that build upon information presented in the whitepaper and are intended to help the Council in their preparation of the Delta Plan: • Levee fragility, including the different potential causes and consequences of levee failure, is highly variable in the Delta. Therefore, one-size-fits-all levee policies are unlikely to be successful. • Current levee policy is driven by state and federal levee standards that are uniformly applied, regardless of risk. This leads to inefficiencies at mitigating risk and is unlikely to perform well under changing future conditions. • Risk-based approaches, which seek to make strategic investments that yield the highest risk reduction, are likely to be most successful, as well as transparent and objective. • To date, all planning efforts have failed to consider that it is more economically efficient to allow some islands to remain flooded following levee failure. New policies need to be established that address this.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP Generally poor construction standards and weak foundations make the levees prone to seepage and settling. In addition, rising sea level, increasing frequency and magnitude of floods, and continued island and levee subsidence are progressively reducing levee reliability. Finally, despite the protestations of some Delta stakeholder groups and their engineers, there is compelling evidence that earthquakes are a major threat to levee stability in the region.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP It is important to remind policymakers that levee stability is not uniform throughout the Delta. Threats to levees in the North and South Delta are primarily associated with high winter and spring flood inflows from the Sacramento, Mokelumne and San Joaquin Rivers. In contrast, most levees in the Western and Central Delta are prone to failure during extreme high tides and winds, and are at higher risk of failure due to earthquakes. In addition, there is high local and regional variability in levee foundations and construction standards, along with regional differences in rates of island subsidence. Finally, land uses, along with land and asset values, are highly variable throughout the Delta.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP These regional differences will be amplified by on-going changes in conditions. Rising sea level disproportionately affects the Western and Central Delta, principally through the increase in frequency and magnitude of extreme high tides. Conversely, changes in runoff patterns, along with flood management operations, are having their greatest impact in the Northern and Southern Delta, where tides are less important. These regional variations, both now and in the future, suggest that one-size-fits-all approaches to levee policies are unlikely to be effective at managing risk under changing conditions.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP The whitepaper gives limited information on the costs involved in adapting the Delta levee network to existing and future conditions. Yet, after public safety, this is likely to be the single most important factor to be considered in developing levee policy within the Delta Plan. The costs of doing anything, as well as nothing, are very high. The economic activity of the Primary Zone is insufficient to support its current levee network, much less mitigate future conditions. For this reason, along with compelling state interest in protecting water supply, energy and transportation infrastructure, the Delta levee system will rely on significant state and federal subsidies for the indefinite future.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP With the exception of the Special Projects program, current levee policy is a one-size-fits-all approach. The Subventions Program, Hazard Mitigation Plan (HMP) standards and PL 84-99 standards are uniformly applied, regardless of the value of assets protected by the levees. As the Council well knows, there is considerable pressure to invest state bond funds in bringing all non-project levees up to the PL 84-99 standard. This upgrade, exceeding \$600M (but likely approaching more than \$1B) reduces the likelihood of levee failure due to flooding by approximately 10% (Suddeth et al., 2010). Since these monies would be spread evenly across the Delta, they do little to reduce aggregate risk since investments are made equally in areas with low or high asset values. Additionally, these upgrades provide only marginal benefits in protection against earthquakes.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP As has been documented by numerous reports, the region's hydrology is changing, leading to increasing flood frequency and magnitude. Hydrologic baselines are shifting, creating a constantly moving target for levee standards. To illustrate the nature of this problem, the current levee height standards are based on hydrologic conditions as measured in 1986. To my knowledge, that standard, as applied to current levees, has not been updated. As outlined in the DRMS reports and in the flood risk whitepaper, the new hydrology, based on 20+ years of additional data, indicates a substantial increase in the elevation of the 1% flood. This means that even if \$1B is invested in order to bring all the levees up to the 1986 PL 84-99 standard, the levees would be out of compliance, pending recalculation of the 1% flood. Moreover, as sea level rise and inflows continue to change, the elevations are likely to be frequently revised upward. Thus, changing hydrology, by periodically placing most Delta levees out of compliance with PL 84-99 standards, creates continuous demand for distributing funds broadly rather than strategically, perpetuating inefficiencies in levee investments to reduce system-wide risk.	This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP As highlighted in the comprehensive review of California levee policy by Galloway et al. (2007), the argument was made that risk-based (rather than standards-based) approaches are needed to guide levee investments. One approach offered by Suddeth et al. (2010) informs and simplifies the process of prioritizing risk reduction investments. Based on the and and asset values of islands, along with the probability of levee failures, Suddeth et al. (2010) use economic decision analysis to identify those islands that do or do not warrant levee upgrades and/or repair following levee failure. This approach formally incorporates risk—the likelihood of flooding x the economic consequences—into decisions. In effect, those islands for which it makes economic sense to repair or upgrade levees are those islands where levee investments yield the greatest impact at reducing aggregate risk. These islands typically contain key infrastructure and/or high value agricultural land. The approach presented by Suddeth et al. (2010) provides only a first step. It does not include additional ecosystem services of the Delta that relate to levee stability. For example, several islands in the Delta provide critical habitat for sensitive or listed terrestrial species. In addition, under current export pumping regimes, the five western islands play a significant role in maintaining low Delta salinities ⁴ . The economic value of these services can eventually be incorporated into the economic decision analysis. However, for the purposes of developing the initial Delta Plan, the Suddeth et al. (2010) approach allows for an objective, Delta-wide comparison of the value of potential levee investments.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP Current policy dictates that the state will only participate in repair of flooded islands if it is deemed to be in the state's interest. All factors, including sea level rise, subsidence, increasing winter inflows, earthquakes and most importantly the costs of upgrading and repairing levees, suggest that under this policy some islands will be allowed to remain flooded following levee failures. It may well be that the evolution of the Delta as place, as outlined in the 2009 legislative package, will be defined by which islands are or are not restored following levee failures. One approach to dealing with the issue of permanently flooded islands is to let the stochastic nature of island failures play itself out, with restoration being determined on a case-by-case basis under current state policy. This "fail into a solution" approach may be the simplest and most politically expedient for the purposes of the Delta Plan. An alternative approach would be to link together the plan for future levee investments with a long-range plan for allowing some islands to remain flooded once levees fail or, alternatively, to choose to pre-flood islands under controlled conditions to reduce impacts. This approach would be controversial and fraught with a number of legal hurdles. However, this approach meets two important criteria for managing changing conditions in the Delta. It identifies where targeted levee improvements are likely to be needed to mitigate the increases in levee vulnerability due to flooding of adjacent islands. It also allows for the development of long-term programs to reduce or mitigate third-party impacts.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management
Member of Delta Independent Science Board	1/7/2011	FLDRSKWP the Council will also need to consider how to prioritize investments in levees in the Delta in a way that achieves the greatest economic efficiency. One approach (of many) is to move away from the use of uniform standards tied to the 1% annual probability flood, which effectively transfers risk to the state and federal government, and toward targeted investments that yield the greatest reduction in overall risk. Economic decision analysis is a transparent, objective way to achieve this. From a policy perspective, the most challenging aspect of an approach like this is the likelihood that a modest number of islands will eventually be allowed to remain flooded. The Plan may choose to assess whether islands should remain flooded on a case-by-case basis, or anticipate, if not prescribe which islands remain flooded. The latter case allows for the reduction of landowner and third-party impacts.	This comment will be considered for preparation of the Delta Plan, including development of considerations to Reduce Risks and the Finance Plan, and the EIR, including description of the Existing Conditions for Flood Management

Matrix 7 Comments Related to Risk Reduction (12/4/10-1/7/11)

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP The paper would benefit from a clearer and more thorough explanation of the original patenting of the Delta lands as "swamp and overflow lands" pursuant to the grant of the Delta area to the State under the Federal Arkansas Act. This program was parallel to the Homestead Acts which passed much of the lands in the Southwestern United States into private ownership in small acreages to accomplish the ideals of the agrarian society which were then widely held. Although the original acreage limitations were successively expanded in order to meet the economic realities of levee building, the original grants at \$1 per acre (refundable upon evidence of reclamation works) were clearly intended to extend farm ownership to western migrating families and/or veterans. The initial attempts to reclaim lands in the lower Delta were largely unsuccessful until the clam shell dredger became available, enabling river bottom sediments to be used for levee construction in lieu of peat soils. Reclamation Districts were formed to assist in the bond financing of the reclamation works which enabled numerous landowners to work together on the reclamation of a large island.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>
Resident of Delta	12/27/2010	<p>AGRESWP Almost all of the current Delta levees were constructed by 1910. Thus, the Delta as we know it today has existed behind levees for over a hundred years and the implication that changes have occurred "over the last century" is generally erroneous. Although the organic soils behind the developed levees have eroded and subsided in the interim, the farming practices have, generally speaking, remained the same. These nitrogen rich soils, subject to periodic catastrophic flooding, are largely farmed today as they were a hundred years ago; to wit: irrigating through flood gates or siphons by methods of sub-irrigation while maintaining farmable soil layers to a depth of 3 or more feet through on-island drainage ditches and canals with drainage waters returned to adjacent channels by pumping. Although substantial portions of the Delta uplands on the peripheries of the Delta have been converted to permanent crops (especially grapes, pears, and some walnuts), most of the lands continue to produce the same or similar crops. Originally, the Delta produced mostly potatoes, onions, alfalfa, wheat and other small grain crops. Specialty crops like canning tomatoes and asparagus came later. [Strangely, potatoes are not mentioned in the current draft. The common practice in the Lower Delta was to lease newly leveed lands to George Shima who would clear, level and ditch the newly reclaimed lands with his considerable teams of horses and Chinese labor in return for 3 years rent-free to produce potatoes.]</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>

Matrix 7 **Comments Related to Risk Reduction (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Resident of Delta	12/27/2010	<p>AGRESWP At several points in the current draft, the statement is made that 313,000 acres of former wetlands were put behind levees. [believe this creates a misleading impression. When the Federal Government surveyed the Delta and designated it as "swamp and overflow lands" most of the land lay above or close to sea level and was not considered tidal wetlands. You may wish to contact George Basye, formerly of the Downey, Brand law firm, who has made quite a study of the distinction between swamp and overflow lands and tidal wetlands in the Delta. The significance of this, in my mind, is that the changes which occurred through reclamation are not as significant as intimated because of agricultural practices undertaken after reclamation, which included seasonal flooding of harvested crop lands for weed suppression and salt removal, were not radically altered. And, in fact, most of the historical surveys of both fish and avian population in the Delta indicate that healthy populations of anadromous and other native and introduced fishes as well as water fowl and other migratory and native birds continued to exist in the Delta for many generations after reclamation was essentially complete.</p>	<p>This comment will be considered for preparation of the Delta Plan and EIR, including description of the Existing Conditions for Agricultural Resources and Flood Management</p>

NOTE: AGRESWP - Agricultural Resources White Paper, FLDRSKWP - Flood Risk White Paper, EMERGPRPWP- Emergency Preparedness White Paper

Matrix 8 **Comments Related to Development of Delta Plan (12/4/10-1/7/11)**

Association	Date	Comment	Status of Comment
Sacramento-San Joaquin Delta Conservancy	12/13/2010	Because of the mandated mission and principles of the Delta Conservancy (Public Resources Code Section' 32322(a) and (b)) we expect to partner with and work closely together with the Council through the development and implementation phases of the Delta Plan. For its part, the Conservancy will continue to participate in various meetings and other forums related to the Delta Plan process and will review and provide comments on documents such as the draft EIR and draft Delta Plan. These comments will reflect our mandated purpose and objectives and better define our role in the Delta Plan. Based on the posted schedule for developing the draft EIR and draft Delta Plan, we anticipate participating in and providing comments for the January 2011 scoping meeting(s) to assist in the development of these documents.	The Council appreciates the assistance to be provided by the Delta Conservancy.